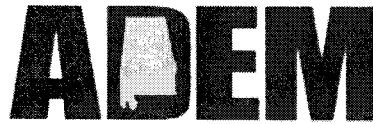


LANCE R. LEFLEUR
DIRECTOR



ROBERT J. BENTLEY
GOVERNOR

Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

April 20, 2015

Ernest Kaufmann
Perry County Associates, LLC
622 Tayloe Road
Uniontown AL 36786

RE: Facility Inspection
Arrowhead Landfill
NPDES Permit # ALG160167
FID 35125.7
Perry County (105)
Inspected 4/17/2015

Dear Mr. Kaufman:

Enclosed is a copy of an inspection report for the above referenced facility. A copy of the inspection report has been transmitted to the Department's Water Division for a compliance determination and any follow-up as appropriate.

Should you have any questions regarding permitting, compliance, enforcement, or any follow-up action you should take to address any deficiencies noted, please contact your ADEM permit staff contact or the Water Division in Montgomery at H2Omail@adem.state.al.us or by phone at (334) 271-7799.

Should you have any questions regarding observations noted during the inspection, please contact me by email at elroberts@adem.state.al.us or by phone at (205) 942-6168.

Sincerely,

A handwritten signature in black ink, appearing to read "Evan Roberts", is written over a horizontal line.

Evan Roberts
Birmingham Branch
Field Operations Division

File: INSPR/17668
ecopy: Water Division
Enclosure: Inspection Report

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Branch
2715 Sandlin Road, S. W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (FAX)



Mobile Branch
2204 Perimeter Road
Mobile, AL 36615-1131
(251) 450-3400
(251) 479-2593 (FAX)

Mobile-Coastal
4171 Commanders Drive
Mobile, AL 36615-1421
(251) 432-6533
(251) 432-6598 (FAX)



Alabama Department of Environmental Management
NPDES INSPECTION REPORT

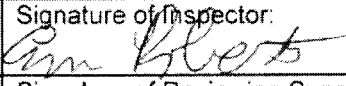

Company/Operator/Permittee: Perry County Associates, LLC		FID 35125.7		Phone Number: (770)720-2717	
Mailing Address: 622 Tayloe Road		City Uniontown		State AL	Zip Code 36786
Responsible Official/Operator Name: Ernest Kaufmann					

Facility Name: Arrowhead Landfill	NPDES Permit #: ALG160167	Permit Effect Date: 02/01/2012	Inspection Entry Date & Time: 4/17/2015 11:10 AM	County: Perry
Activity Description Landfill	NMS Inspection #: 48836	Permit Expire Date: 01/31/2017	Inspection Exit Date & Time: 4/17/2015 2:59 PM	Report Complete Date: 4/20/2015
Inspection Type: (X) CEI () CSI () PAI Routine () Complaint (X) Photos Taken (X) Samples Collected (X)				

Township, Range, Section: T17N, R6E, S28
Physical Address/Location Description (include nearest city): County Road 1, near Perry, AL

Entrance Latitude & Longitude: 32.413512, -87.473396
Discharge Point(s) Latitude & Longitude: 32.41486, -87.465887, 32.41481, -87.47281; 32.41019, -87.46792
Receiving Water(s): UT Tayloe Creek, UT Chilatchee Creek
Weather Conditions: Intermittent rain, warm

Summary: Disturbed areas that were not currently in use had not been vegetated or otherwise stabilized. Stormwater from disturbed area was observed entering drainage ditch north and downgradient of sampling point for DSN 001-2. Turbid stormwater observed leaving landfill property near southeast corner of facility, at latitude 32.41019, longitude -87.46792, was not a permitted outfall. This stormwater drained from an unused storage field that was not stabilized, but not from landfill cells. Turbidity of the stormwater discharge alongside County Road 21 was 118 NTUs. Turbidity of the unnamed tributary of Chilatchee Creek upstream of the discharge was 34.5 NTUs. Turbidity of the unnamed tributary of Chilatchee Creek downstream of the discharge was 55.7 NTUs, a difference of 21.2 NTUs.

Name(s) of On-site Representative(s) and Phone Numbers: Thad Owings, (770)7250-2717		
Name of Inspector: Evan Roberts	Signature of Inspector: 	Date: 4/20/2015
Name of Reviewing Supervisor: Derick Houston	Signature of Reviewing Supervisor: 	Date: 4/20/2015

FOD Office: Birmingham

NPDES INDUSTRIAL STORMWATER INSPECTION REPORT

FACILITY NAME: Arrowhead Landfill		PERMIT NUMBER: ALG160167			
I. RECORDS					
A. Copy of Permit Available	N/A	X YES	NO	Comment #	
B. Discharge Monitoring Reports (DMRs) Available	N/A	X YES	NO	Comment #	
DMRs Retained for 3 Years	N/A	X YES	NO	Comment #	
C. Laboratory Records Available	N/A	X YES	NO	Comment #	
Laboratory Records Retained for 3 Years	N/A	X YES	NO	Comment #	
D. Commercial Lab Used for Reported Analyses	N/A	X YES	NO	Comment #	
Name: Analytical Services, Inc.	Location: Norcross, GA				
E. Adequate Records Maintained of::					
1. Sample Date, Time and Location	N/A	X YES	NO	Comment #	
2. Analyses Date and Time	N/A	X YES	NO	Comment #	
3. Analytical Methods	N/A	X YES	NO	Comment #	
4. Standard Methods/EPA Approved Analytical Method	N/A	X YES	NO	Comment #	
5. Analyst	N/A	X YES	NO	Comment #	
6. Lab Equipment Calibration and Maintenance	N/A	X YES	NO	Comment #	
7. Rainfall Data	N/A	X YES	NO	Comment #	
F. Correct Name and Mailing Address of Permittee	N/A	X YES	NO	Comment #	
II. POLLUTION PREVENTION PRACTICES/PLANS					
A. Best Management Practices (BMP) Plan Available	N/A	X YES	NO	Comment #	
Last Update to BMP Plan: January 2015					
B. BMP Measures Appear Adequate, If no provide	N/A	YES	X NO	Comment # 1	
C. BMP Training Records Available	N/A	X YES	NO	Comment #	
D. BMP Inspection Records Available	N/A	X YES	NO	Comment #	
Inspection Records Retained for 3 Years	N/A	X YES	NO	Comment #	
E. Spill Prevention Control and Countermeasures (SPCC) Plan Available	N/A	X YES	NO	Comment # 2	
Last Update to SPCC: January 2015					
List Tanks and Capacities in Comment Section					
F. Pollution Prevention (P2)/Source Reduction Plan and/or P2 Practices	N/A	X YES	NO	Comment #	
G. All Discharges Appear to be properly Permitted	N/A	YES	X NO	Comment # 3	
H. Adequate Containment for Products/Byproducts and Waste Materials	N/A	X YES	NO	Comment #	
III. MONITORING INFORMATION					
A. Flow Measurement					
Method of measurement on Non-Stormwater Outfalls: Instantaneous Weir Other					
B. Sampling					
1. Location(s) Adequate	N/A	YES	X NO	Comment # 4	
2. Sample Type(s) Agree with Permit	N/A	X YES	NO	Comment #	
3. Preservation Techniques Agree with 40 CFR 136	N/A	X YES	NO	Comment #	
4. Sample Holding Times Agree with EPA Guidance	N/A	X YES	NO	Comment #	
5. Monitoring and Analyses Performed More Frequently Than Required	N/A	YES	X NO	Comment #	
6. If Yes to 5, Results are Reported in Permittee's Self Monitoring Report	X N/A	YES	NO	Comment #	
7. Stormwater Samples Collected in Accordance with Permit Requirements	N/A	X YES	NO	Comment #	

N/A – Not Applicable

NPDES INDUSTRIAL STORMWATER INSPECTION REPORT

IV. EFFLUENT/RECEIVING WATER VISUAL OBSERVATIONS			
Outfall(s) have Oil Sheen	YES	<input checked="" type="checkbox"/> NO	Comment #
Outfall(s) have Visible Foam	YES	<input checked="" type="checkbox"/> NO	Comment #
Outfall(s) have Visible Floating Solids	YES	<input checked="" type="checkbox"/> NO	Comment #

V. COMMENTS		
Comment No.	Comment	Photograph No.
1	Disturbed areas that were not currently in use had not been vegetated or otherwise stabilized.	3, 14-16
2	No fuel or chemical storage. Leachate tank was within secondary containment.	17-18
3	Turbid stormwater observed leaving landfill property near southeast corner of facility, at latitude 32.41019, longitude -87.46792, was not a permitted outfall. This stormwater drained from an unused storage field that was not stabilized, but not from landfill cells.	1-9
4	Stormwater from disturbed area was observed entering drainage ditch north and downgradient of sampling point for DSN 001-2.	11-16

VI. SAMPLE RESULTS
<p>Turbidity of stormwater discharge alongside County Road 21 was 118 NTUs.</p> <p>Turbidity of the unnamed tributary of Chilatchee Creek upstream of the discharge was 34.5 NTUs.</p> <p>Turbidity of the unnamed tributary of Chilatchee Creek downstream of the discharge was 55.7 NTUs, a difference of 21.2 NTUs.</p>

H. LOWRY TRIBBLE, JR., P.E.
WILLIAM F. HODGES, P.E.
W. MICHAEL STUBBS, P.E.
R. BRANT LANE, P.E.
CLINT L. COURSON, CHMM
K. MATTHEW CHEEK, P.E.
DANIEL E. CHEEK, P.E.
KEVIN G. BERRY, P.E.



NATHAN D. DUNN, P.E.
RYAN S. WILLOUGHBY, P.E.
WILLIAM A. GRANICH, P.E.
ROBERT D. HELLER, CHMM
ERIC P. JACKSON, P.E.
DAVID E. BATTSON, P.E.
RYAN S. PETERS, P.E.
WILLIAM M. REESE, P.E.

May 12, 2015

Mr. Evan Roberts
Birmingham Branch
Field Operations Division
110 Vulcan Road
Birmingham, Alabama 35209

**Re: Arrowhead Landfill
ADEM Facility Inspection Response Letter
NPDES Permit No. ALG160167
HHNT Project No. 3006-029-13**

Dear Mr. Roberts:

On behalf of Arrowhead Landfill, this letter is in response to your storm water inspection report dated April 20, 2015 corresponding to your site visit on April 17, 2015. It is our understanding that your inspection visit was conducted in response to citizen complaints received from Mr. Adam Johnston of the Alabama River Alliance received on April 8, 2015, as well as another complaint from Mr. William Gibson on April 15, 2015.

Arrowhead Landfill would like to respond to the comments on your inspection report, and to assure ADEM that the facility is dedicated to maintaining a high standard of environmental compliance. In order to provide a detailed response, we have listed each comment below in bold and the facility's responses and/or corrective actions in italics.

Inspection Comment #1: Disturbed areas that were not currently in use had not been vegetated or otherwise stabilized.

Response: Arrowhead Landfill acknowledges that disturbed areas at the facility required grassing during the inspection on April 17, 2015. These areas had become bare after a long, wet and cold winter when grassing was difficult. We will forward under separate cover photographic documentation that the subject disturbed areas have been seeded and mulched in order to establish vegetation and stabilize the areas. These areas will continue to be inspected as part of the facility's bi-weekly routine operations in order to ensure a stand of vegetation is established and maintained. Should industrial activities be conducted

in one of these locations in the future, the outfall locations of DSN001-1 and DSN001-2 will be reevaluated.

Inspection Comment #2: **No fuel or chemical storage. Leachate tank was within secondary containment.**

Response: *The facility's current Spill Pollution, Prevention, and Countermeasure Plan was last updated in January 2015. The attached page from the current plan lists the onsite petroleum storage tanks, which are all located on the mobile maintenance truck. The mobile maintenance truck is utilized throughout the facility for daily operations and is parked over the landfill liner at night or when not in use. The landfill liner serves as secondary containment and is sufficiently impervious to contain a spill, leak, or the entire contents of the mobile maintenance truck. This comment did not note any deficiencies and this response is provided for clarification purposes only.*

Inspection Comment #3: **Turbid storm water observed leaving landfill property near southeast corner of facility at latitude 32.41019, longitude -87.46792, was not a permitted outfall. This storm water drained from an unused storage field that was not stabilized, but not from landfill cells.**

Response: *Hodges, Harbin, Newberry & Tribble, Inc. has reviewed facility drainage patterns and has delineated the outfall drainage areas onsite. Additionally, the permit and state water quality rules were reviewed to assess the inspector's comment. Arrowhead Landfill is not of the opinion that the identified "unpermitted discharge" qualifies as a discharge, as defined in the NPDES General Permit (ALG160000). Discharges from specific industrial activities are authorized under this Permit; however, none of these activities are conducted in the unused storage area. Therefore, it is our opinion that permit coverage is not required for this area of the facility. We have reviewed the most recent topographic quadrangle published by the USGS dated 2014, and the nearest stream depicted on the quad map is located across Co. Rd. 1 (Cahaba Road) from the landfill.*

Additionally, as noted in your inspection report, the turbidity monitoring results indicated a difference of 21.2 NTUs upstream and downstream of the subject runoff location. This upstream and downstream variance is in compliance with the permit limits (a parameter only required to be sampled during times of construction, which is not occurring). The Permit limits the downstream turbidity to less than or equal to 50 NTUs above the upstream turbidity of a sampling location during times of construction. Existing BMPs in this

area include four rock check dams installed along the ditch draining to this runoff location and one larger rock check dam adjacent to the road. These storm water BMPs are inspected bi-weekly to ensure proper function, per the Permit.

As noted above, we will submit under separate cover photographic documentation that the disturbed area in the vicinity of the location where runoff is leaving the site at Cahaba Road has been seeded and mulched. Vegetation can greatly reduce the amount of sediment in storm water runoff. This area will continue to be inspected as part of the facility's bi-weekly routine operations in order to ensure a stand of vegetation is established and maintained.

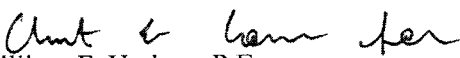
Inspection Comment #4: **Storm water from disturbed area was observed entering drainage ditch north and downgradient of sampling point DSN001-2.**

Response: *As mentioned above, Arrowhead Landfill acknowledges that disturbed areas at the facility required grassing during the inspection on April 17, 2015. We will forward photographic documentation under separate cover that the subject disturbed area (the area northeast of DSN001-2) has been seeded and mulched in order to establish vegetation and stabilize the area. No landfill industrial activities are conducted in or around the disturbed area. This area will continue to be maintained to prevent sediment from leaving the site via storm water runoff. Should industrial activities be conducted in this location in the future, the need for an additional outfall will be reevaluated.*

Should you have any questions, please call.

Sincerely,

HODGES, HARBIN, NEWBERRY & TRIBBLE, INC.


William F. Hodges, P.E.
Professional Engineer

Enclosure

cc:	Scott Story (w/enclosure)	Brent Watson (w/enclosure)
	Lee Warren (w/enclosure)	Ernest Kaufmann (w/enclosure)
	Oscar Allen (w/enclosure)	Thad Owings (w/enclosure)
	James Ashburn (w/enclosure)	Joy Hammonds (w/enclosure)

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN

FOR
ARROWHEAD LANDFILL
PERRY COUNTY ASSOCIATES, LLC
622 TAYLOE ROAD
UNIONTOWN, AL 36786

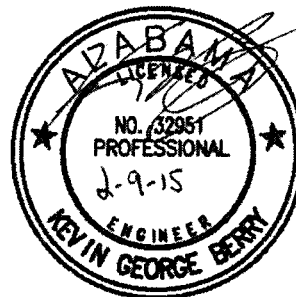
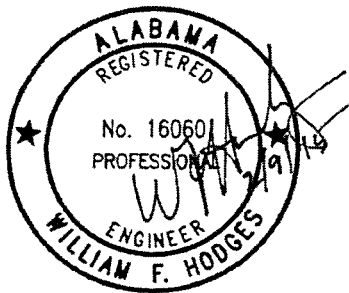
PERRY COUNTY, ALABAMA

Original Date of Plan:
Date of Last Plan Amendment / P.E. Certification:
Date of Last Plan Review:
Designated Person Accountable for Spill Prevention:
(Referred to as Facility Response Coordinator in Plan)

August 15, 2009
January 2015
January 2015
James Ashburn



HODGES, HARBIN,
NEWBERRY & TRIBBLE, INC.
Consulting Engineers



The following table is a listing and brief description of the current petroleum storage on-site:

TABLE 1		
Tank Number/ Other Type of Container(s)	Description (gallons, construction, containment, etc.)	Location (above or below ground, location on site)
1.	100-gallon transmission fluid	aboveground; on mobile maintenance truck that is parked over landfill liner when not in use.
2.	125-gallon motor oil	aboveground; on mobile maintenance truck that is parked over landfill liner when not in use.
3.	55-gallon gear oil	aboveground; on mobile maintenance truck that is parked over landfill liner when not in use.
4.	100-gallon anti-freeze	aboveground; on mobile maintenance truck that is parked over landfill liner when not in use.
5.	150-gallon hydraulic fluid	aboveground; on mobile maintenance truck that is parked over landfill liner when not in use.
6.	1,800-gallon diesel tank	aboveground; on mobile maintenance truck that is parked over landfill liner when not in use.
7.	150-gallon used oil	aboveground; on mobile maintenance truck that is parked over landfill liner when not in use.
TOTAL = ±2,480 gallons		
Note:		
1. The mobile maintenance truck will be parked over the landfill liner when not in use. The landfill liner is sufficient to contain 110% of the single largest tank volume.		

Equipment on-site which contains petroleum consists of: Dump Truck(s), Backhoe(s), Compactor(s), and D6 Dozer(s). The oil products used by these pieces of equipment are considered "motive power containers" as defined in 40 CFR 112.2 and are exempt from the SPCC Rule in accordance with 40 CFR 112.1(d)(7).

All equipment is visually inspected daily for leaks.

4.3 Drainage Pathway and Distance to Navigable Water

The landfill is located in Perry County, Alabama at 622 Tayloe Road Uniontown, AL 36786. All areas of the landfill drain via ditches and sediment ponds to an unnamed tributary of Tayloe Creek.



HODGES, HARBIN,
 NEWBERRY & TRIBBLE, INC.
 Consulting Engineers

LANCE R. LEFLEUR
DIRECTOR



ROBERT J. BENTLEY
GOVERNOR

Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

MAY 22 2015

ERNEST KAUFMANN, PRESIDENT
PERRY COUNTY ASSOCIATES LLC
622 TAYLOE ROAD
UNIONTOWN AL 36786

RE: Compliance Evaluation Inspection
Arrowhead Landfill
622 Tayloe Road
Uniontown, AL 36786
General NPDES Permit No. ALG160167
Perry County (105)

Dear Mr. Kaufmann:

The Department has received your May 12, 2015 response to the Compliance Evaluation Inspection (CEI) conducted on April 17, 2015.

During the inspection, the inspector observed storm water drainage from a concrete pipe storage area in the southeastern portion of the property. The land was not sufficiently vegetated or stabilized to prevent erosion during storm water runoff. At the time of inspection, turbid storm water from this area was observed leaving the landfill property near the southeast corner of the facility. The upstream and downstream turbidity difference of the stream receiving the runoff was 21.2 NTUs, which was within the water quality criteria of no greater than 50 NTUs. These issues were addressed by the permittee in a letter received by the Department on May 12, 2015. Below is the Department's response to the comments made on behalf of the permittee, Arrowhead Landfill:

Inspection Comment #1: Disturbed areas that were not currently in use had not been vegetated or otherwise stabilized. Your response indicated that these areas would be seeded and mulched. It was also indicated that these areas will continue to be inspected twice per week as part of the facility operations in order to ensure vegetation is established and maintained. *The facility should maintain logs of these inspections such that they are available to the Department during site inspections. The Department has not received the photographs which were referenced in your response. However, a phone call from your consultant, Clint Courson of Hodges, Harbin, Newberry and Tribble, Inc., on May 21, 2015, indicated they are forthcoming. Within 30 days from receipt of this letter, please provide photographs (with dates) to the Water Division that document the progress of vegetation establishment.*

Inspection Comment #2: No fuel or chemical storage. Leachate tank was within secondary containment. Your response referred to the facility's Spill Prevention, Control and Countermeasure Plan. Tanks and onsite petroleum storage are all located on the mobile maintenance truck. *This inspection comment was an observation made by the inspector and not a noted deficiency.*

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Branch
2715 Sandlin Road, S.W.
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(256) 340-9359 (FAX)

Mobile Branch
2204 Perimeter Road
Mobile, AL 36615-1131
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(251) 479-2593 (FAX)

Mobile-Coastal
3664 Dauphin Street, Suite B
Mobile, AL 36608
(251) 304-1176
(251) 304-1189 (FAX)

Inspection Comment #3: Turbid stormwater observed leaving landfill property near southeast corner of facility, at latitude 32.41019, longitude -87.46792, was not a permitted outfall. This stormwater drained from an unused storage field that was not stabilized, but not from landfill cells. Your response indicated that permit coverage would not be applicable to this area since landfill activity was not occurring at that location and the turbidity observed would have been within permit limits. You also indicated that this area would be re-vegetated and inspected bi-weekly to ensure the vegetation remains established. *As indicated above, please provide photographs to the Water Division that document the progress of vegetation establishment and maintenance. Please note that the permittee should implement and maintain adequate Best Management Practices (BMPs) to minimize or prevent the discharge of solids.*

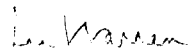
Inspection Comment #4: Stormwater from disturbed area was observed entering drainage ditch north and down gradient of sampling point for DSN 001-2. Your response reiterated that industrial activity did not occur in or around the disturbed area and that the area would be re-vegetated. *This inspection comment was an observation made by the inspector.*

To document vegetation of the area in question, no later than 90 days from receipt of this letter, please provide photographs (with dates) to the Department that document the progress of vegetation establishment, and the continued maintenance of the vegetation. The submittal should be mailed to **Dodi Moseley** in the Department at the Montgomery address shown at the top of this letter.

The Department encourages you to voluntarily consider pollution prevention strategies to prevent potential future violations.

If you have questions regarding this matter, please contact Dodi Moseley by email at dbmoseley@adem.state.al.us or by phone at (334) 271-7725.

Sincerely,



Lee Warren, Chief
Industrial General Permit Section
Water Division

LW/dbm

File: CEI/17668

Encl(s): CEI Report

Pc: Lee Warren, ADEM, Industrial General Permit Section
Dodi Moseley, ADEM, Industrial General Permit Section
Brad Stearns, ADEM, Water Division
Derick Houston, ADEM, Field Operations Division, Birmingham
Evan Roberts, ADEM, Field Operations Division, Birmingham
Eric Sanderson, ADEM, Land Division



Alabama Department of Environmental Management
NPDES INSPECTION REPORT

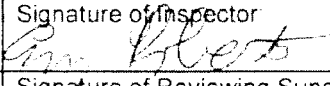
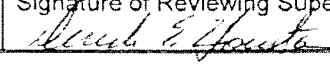
Company/Operator/Permittee: Perry County Associates, LLC		FID 35125 7	Phone Number: (770)720-2717	
Mailing Address: 622 Tayloe Road		City Uniontown	State AL	Zip Code 36786
Responsible Official/Operator Name: Ernest Kaufmann				

Facility Name: Arrowhead Landfill	NPDES Permit #: ALG160167	Permit Effect Date: 02/01/2012	Inspection Entry Date & Time: 4/17/2015 11:10 AM	County: Perry
Activity Description: Landfill	NMS Inspection #: 48836	Permit Expire Date: 01/31/2017	Inspection Exit Date & Time: 4/17/2015 2:59 PM	Report Complete Date: 4/20/2015
Inspection Type: (X) CEI () CSI () PAI Routine () Complaint (X) Photos Taken (X) Samples Collected (X)				

Township, Range, Section: T17N, R6E, S28
Physical Address/Location Description (include nearest city): County Road 1, near Perry, AL

Entrance Latitude & Longitude: 32.413512, -87.473396
Discharge Point(s) Latitude & Longitude: 32.41486, -87.465887, 32.41481, -87.47281; 32.41019, -87.46792
Receiving Water(s): UT Tayloe Creek, UT Chilatchee Creek
Weather Conditions: Intermittent rain, warm

Summary Disturbed areas that were not currently in use had not been vegetated or otherwise stabilized. Stormwater from disturbed area was observed entering drainage ditch north and downgradient of sampling point for DSN 001-2. Turbid stormwater observed leaving landfill property near southeast corner of facility, at latitude 32.41019, longitude -87.46792, was not a permitted outfall. This stormwater drained from an unused storage field that was not stabilized, but not from landfill cells. Turbidity of the stormwater discharge alongside County Road 21 was 118 NTUs. Turbidity of the unnamed tributary of Chilatchee Creek upstream of the discharge was 34.5 NTUs. Turbidity of the unnamed tributary of Chilatchee Creek downstream of the discharge was 55.7 NTUs, a difference of 21.2 NTUs.
--

Name(s) of On-site Representative(s) and Phone Numbers: Thad Owings, (770)7250-2717		
Name of Inspector: Evan Roberts	Signature of Inspector: 	Date: 4/20/2015
Name of Reviewing Supervisor: Derick Houston	Signature of Reviewing Supervisor: 	Date: 4/20/2015

FOD Office: Birmingham

NPDES INDUSTRIAL STORMWATER INSPECTION REPORT

FACILITY NAME: Arrowhead Landfill		PERMIT NUMBER: ALG160167			
I. RECORDS					
A. Copy of Permit Available	N/A	X YES	NO	Comment #	
B. Discharge Monitoring Reports (DMRs) Available	N/A	X YES	NO	Comment #	
DMRs Retained for 3 Years	N/A	X YES	NO	Comment #	
C. Laboratory Records Available	N/A	X YES	NO	Comment #	
Laboratory Records Retained for 3 Years	N/A	X YES	NO	Comment #	
D. Commercial Lab Used for Reported Analyses	N/A	X YES	NO	Comment #	
Name: Analytical Services, Inc.	Location: Norcross, GA				
E. Adequate Records Maintained of:					
1. Sample Date, Time and Location	N/A	X YES	NO	Comment #	
2. Analyses Date and Time	N/A	X YES	NO	Comment #	
3. Analytical Methods	N/A	X YES	NO	Comment #	
4. Standard Methods/EPA Approved Analytical Method	N/A	X YES	NO	Comment #	
5. Analyst	N/A	X YES	NO	Comment #	
6. Lab Equipment Calibration and Maintenance	N/A	X YES	NO	Comment #	
7. Rainfall Data	N/A	X YES	NO	Comment #	
F. Correct Name and Mailing Address of Permittee	N/A	X YES	NO	Comment #	
II. POLLUTION PREVENTION PRACTICES/PLANS					
A. Best Management Practices (BMP) Plan Available	N/A	X YES	NO	Comment #	
Last Update to BMP Plan: January 2015					
B. BMP Measures Appear Adequate, If no provide	N/A	YES	X NO	Comment # 1	
C. BMP Training Records Available	N/A	X YES	NO	Comment #	
D. BMP Inspection Records Available	N/A	X YES	NO	Comment #	
Inspection Records Retained for 3 Years	N/A	X YES	NO	Comment #	
E. Spill Prevention Control and Countermeasures (SPCC) Plan Available	N/A	X YES	NO	Comment # 2	
Last Update to SPCC January 2015					
List Tanks and Capacities in Comment Section					
F. Pollution Prevention (P2)/Source Reduction Plan and/or P2 Practices	N/A	X YES	NO	Comment #	
G. All Discharges Appear to be properly Permitted	N/A	YES	X NO	Comment # 3	
H. Adequate Containment for Products/Byproducts and Waste Materials	N/A	X YES	NO	Comment #	
III. MONITORING INFORMATION					
A. Flow Measurement					
Method of measurement on Non-Stormwater Outfalls. Instantaneous Weir Other					
B. Sampling					
1. Location(s) Adequate	N/A	YES	X NO	Comment # 4	
2. Sample Type(s) Agree with Permit	N/A	X YES	NO	Comment #	
3. Preservation Techniques Agree with 40 CFR 136	N/A	X YES	NO	Comment #	
4. Sample Holding Times Agree with EPA Guidance	N/A	X YES	NO	Comment #	
5. Monitoring and Analyses Performed More Frequently Than Required	N/A	YES	X NO	Comment #	
6. If Yes to 5, Results are Reported in Permittee's Self Monitoring Report	X N/A	YES	NO	Comment #	
7. Stormwater Samples Collected in Accordance with Permit Requirements	N/A	X YES	NO	Comment #	

N/A – Not Applicable

NPDES INDUSTRIAL STORMWATER INSPECTION REPORT

IV. EFFLUENT/RECEIVING WATER VISUAL OBSERVATIONS

Outfall(s) have Oil Sheen	YES	X NO	Comment #
Outfall(s) have Visible Foam	YES	X NO	Comment #
Outfall(s) have Visible Floating Solids	YES	X NO	Comment #

V. COMMENTS

Comment No.	Comment	Photograph No.
1	Disturbed areas that were not currently in use had not been vegetated or otherwise stabilized.	3, 14-16
2	No fuel or chemical storage. Leachate tank was within secondary containment.	17-18
3	Turbid stormwater observed leaving landfill property near southeast corner of facility, at latitude 32.41019, longitude -87.46792, was not a permitted outfall. This stormwater drained from an unused storage field that was not stabilized, but not from landfill cells.	1-9
4	Stormwater from disturbed area was observed entering drainage ditch north and downgradient of sampling point for DSN 001-2	11-16

VI. SAMPLE RESULTS

Turbidity of stormwater discharge alongside County Road 21 was 118 NTUs.
Turbidity of the unnamed tributary of Chilatchee Creek upstream of the discharge was 34.5 NTUs.
Turbidity of the unnamed tributary of Chilatchee Creek downstream of the discharge was 55.7 NTUs, a difference of 21.2 NTUs

LANCE R. LEFLEUR
DIRECTOR



Alabama Department of Environmental Management
adem.alabama.gov
1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

ROBERT J. BENTLEY
GOVERNOR

November 16, 2015

Ernest Kaufmann
Perry County Associates, LLC
134 Riverstone Terrace, Suite 203
Canton GA 30114

RE: Facility Inspection
Arrowhead Landfill
NPDES Permit # ALG160167
FID 35125.10
Perry County (105)
Inspected 11/13/2015

Dear Mr. Kaufmann:

Enclosed is a copy of an inspection report for the above referenced facility. A copy of the inspection report has been transmitted to the Department's Water Division for a compliance determination and any follow-up as appropriate.

Should you have any questions regarding permitting, compliance, enforcement, or any follow-up action you should take to address any deficiencies noted, please contact your ADEM permit staff contact or the Water Division in Montgomery at H2Omail@adem.state.al.us or by phone at (334) 271-7799.

Should you have any questions regarding observations noted during the inspection, please contact me by email at elroberts@adem.state.al.us or by phone at (205) 942-6168.

Sincerely,

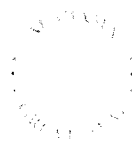
A handwritten signature in black ink, appearing to read "Evan Roberts", is written over a faint circular stamp.

Evan Roberts
Birmingham Branch
Field Operations Division

File: INSPR/17668
ecopy: Water Division
Enclosure: Inspection Report

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Branch
2715 Sandlin Road, S.W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (FAX)



Mobile Branch
2204 Perimeter Road
Mobile, AL 36615-1131
(251) 450-3400
(251) 479-2593 (FAX)

Mobile-Coastal
4171 Commanders Drive
Mobile, AL 36615-1421
(251) 432-6533
(251) 432-6598 (FAX)



Alabama Department of Environmental Management
NPDES INSPECTION REPORT


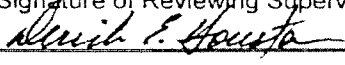
Company/Operator/Permittee: Perry County Associates, LLC		FID 35125.10	Phone Number: (770)720-2717	
Mailing Address: 134 Riverstone Terrace, Suite 203	City Canton	State GA	Zip Code 30114	
Responsible Official/Operator Name: Ernest Kaufmann				

Facility Name: Arrowhead Landfill	NPDES Permit #: ALG160167	Permit Effect Date: 02/01/2012	Inspection Entry Date & Time: 11/13/2015 12:49 PM	County: Perry
Activity Description Solid Waste Landfill	NMS Inspection #: 51277	Permit Expire Date: 01/31/2017	Inspection Exit Date & Time: 11/13/2015 2:57 PM	Report Complete Date: 11/16/2015
Inspection Type: (X) CEI () CSI () PAI Routine () Complaint (X) Photos Taken (X) Samples Collected ()				

Township, Range, Section: T17N, R6E, S23
Physical Address/Location Description (include nearest city): County Road 1, near Perry, AL

Entrance Latitude & Longitude: 32.413512, -87.473396
Discharge Point(s) Latitude & Longitude: 32.41486, -87.465887, 32.41481, -87.47281; 32.41019, -87.46792
Receiving Water(s): UT Tayloe Creek, UT Chilatchee Creek
Weather Conditions: Partly cloudy and cool

Summary: Inspection was conducted in response to a complaint of a whitish discharge on the south side of the facility. Stormwater was observed leaving landfill property near southeast corner of facility, at latitude 32.41019, longitude -87.46792, downgradient from non-landfill areas. This area had a slight discharge. See sample results on page 3. Areas not in use had been grassed since the 4/17/2015 inspection. Grass was patchy in area near southeast side of facility. Facility outfalls were not discharging. According to facility records, pH was analyzed out of holding time for samples collected on 6/29/2015.

Name(s) of On-site Representative(s) and Phone Numbers: John Sikes, (334)247-2126		
Name of Inspector: Evan Roberts	Signature of Inspector: 	Date: 11/16/2015
Name of Reviewing Supervisor: Derick Houston	Signature of Reviewing Supervisor: 	Date: 11/16/2015

FOD Office: Birmingham

NPDES INDUSTRIAL STORMWATER INSPECTION REPORT

FACILITY NAME: Arrowhead Landfill		PERMIT NUMBER: ALG160167		
I. RECORDS				
A. Copy of Permit Available	N/A	X YES	NO	Comment #
B. Discharge Monitoring Reports (DMRs) Available	N/A	X YES	NO	Comment #
DMRs Retained for 3 Years	N/A	X YES	NO	Comment #
C. Laboratory Records Available	N/A	X YES	NO	Comment #
Laboratory Records Retained for 3 Years	N/A	X YES	NO	Comment #
D. Commercial Lab Used for Reported Analyses	N/A	X YES	NO	Comment #
Name: Analytical Services, Inc.	Location: Norcross, GA			
E. Adequate Records Maintained of:				
1. Sample Date, Time and Location	N/A	X YES	NO	Comment #
2. Analyses Date and Time	N/A	X YES	NO	Comment #
3. Analytical Methods	N/A	X YES	NO	Comment #
4. Standard Methods/EPA Approved Analytical Method	N/A	X YES	NO	Comment #
5. Analyst	N/A	X YES	NO	Comment #
6. Lab Equipment Calibration and Maintenance	N/A	X YES	NO	Comment #
7. Rainfall Data	N/A	X YES	NO	Comment #
F. Correct Name and Mailing Address of Permittee	N/A	X YES	NO	Comment #
II. POLLUTION PREVENTION PRACTICES/PLANS				
A. Best Management Practices (BMP) Plan Available	N/A	X YES	NO	Comment #
Last Update to BMP Plan: January 2015				
B. BMP Measures Appear Adequate, If no provide	N/A	X YES	NO	Comment #
C. BMP Training Records Available	N/A	X YES	NO	Comment #
D. BMP Inspection Records Available	N/A	X YES	NO	Comment #
Inspection Records Retained for 3 Years	N/A	X YES	NO	Comment #
E. Spill Prevention Control and Countermeasures (SPCC) Plan Available	N/A	X YES	NO	Comment # 1
Last Update to SPCC: January 2015				
List Tanks and Capacities in Comment Section				
F. Pollution Prevention (P2)/Source Reduction Plan and/or P2 Practices	N/A	X YES	NO	Comment #
G. All Discharges Appear to be properly Permitted	N/A	X YES	NO	Comment #
H. Adequate Containment for Products/Byproducts and Waste Materials	N/A	X YES	NO	Comment #
III. MONITORING INFORMATION				
A. Flow Measurement				
Method of measurement on Non-Stormwater Outfalls: Instantaneous Weir Other				
B. Sampling				
1. Location(s) Adequate	N/A	X YES	NO	Comment #
2. Sample Type(s) Agree with Permit	N/A	X YES	NO	Comment #
3. Preservation Techniques Agree with 40 CFR 136	N/A	X YES	NO	Comment #
4. Sample Holding Times Agree with EPA Guidance	N/A	YES	X NO	Comment # 2
5. Monitoring and Analyses Performed More Frequently Than Required	N/A	YES	X NO	Comment #
6. If Yes to 5, Results are Reported in Permittee's Self Monitoring Report	X N/A	YES	NO	Comment #
7. Stormwater Samples Collected in Accordance with Permit Requirements	N/A	X YES	NO	Comment #

N/A – Not Applicable

NPDES INDUSTRIAL STORMWATER INSPECTION REPORT

IV. EFFLUENT/RECEIVING WATER VISUAL OBSERVATIONS

Outfall(s) have Oil Sheen	YES	X NO	Comment #
Outfall(s) have Visible Foam	YES	X NO	Comment #
Outfall(s) have Visible Floating Solids	YES	X NO	Comment #

V. COMMENTS

Comment No.	Comment	Photograph No.
1	No fuel or chemical storage. Leachate tank was within secondary containment.	
2	pH was analyzed out of holding time for samples collected on 6/29/2015.	

VI. SAMPLE RESULTS

- Outfalls were not discharging.
- Stormwater discharge alongside County Road 21:
- pH = 7.50 s.u
- Dissolved oxygen = 5.18 mg/L
- Turbidity = 9.64 NTUs.

Perry County Associates, LLC
Arrowhead Landfill
ALG160167
Perry County
Evan Roberts
November 13, 2016

Area had been grassed since previous inspection. Grass was patchy.



To right of previous. Area had been grassed since previous inspection. Grass was patchy.



3

Drainage ditch downgradient of previous photo.



4

Landfill area. Road. Drainage ditch for non-landfill areas.



5

Drainage ditch downgradient of non-landfill areas.



6

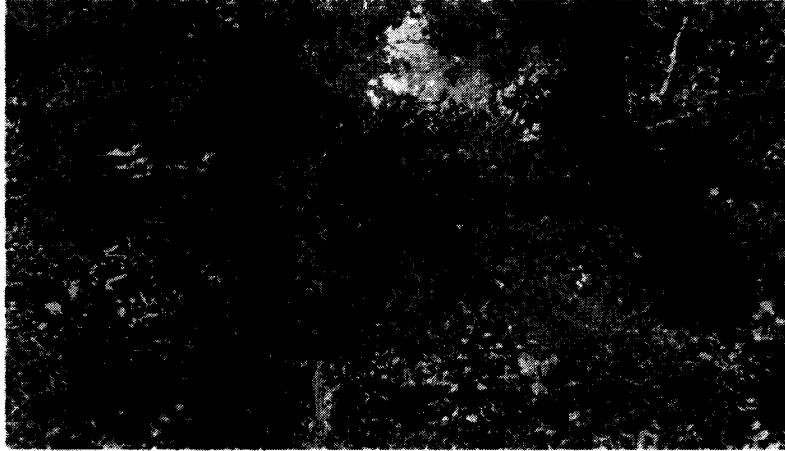
Pool of water. Check dam.



Edge of pool.



Minimal discharge from pool to roadside ditch.



9

Light-colored sediment staining on leaves around roadside ditch.



10

Pond for outfall 001-2.



19

Outfall 001-2 was not discharging.



No flow.

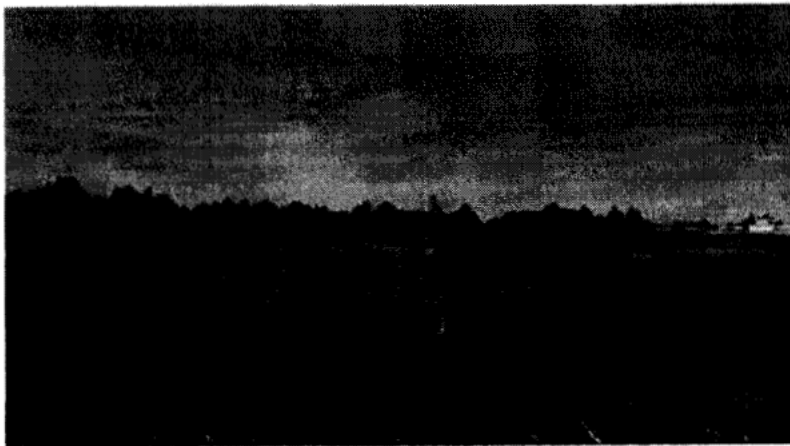
20

Area near outfall 001-2 had been grassed since previous inspection.



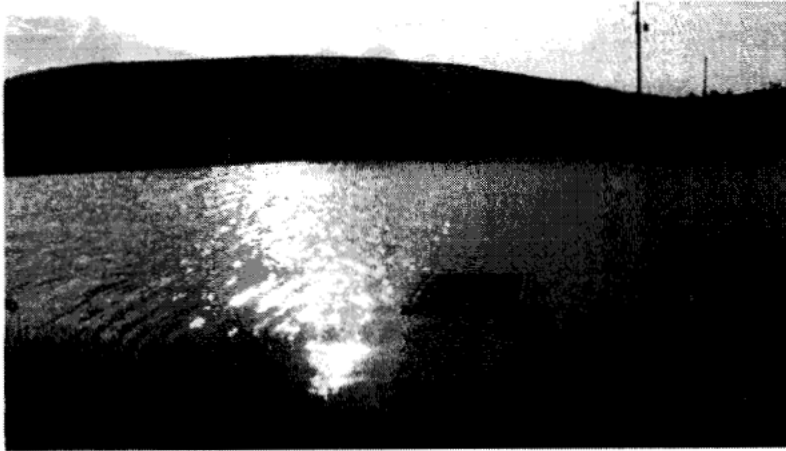
13

To right of previous.



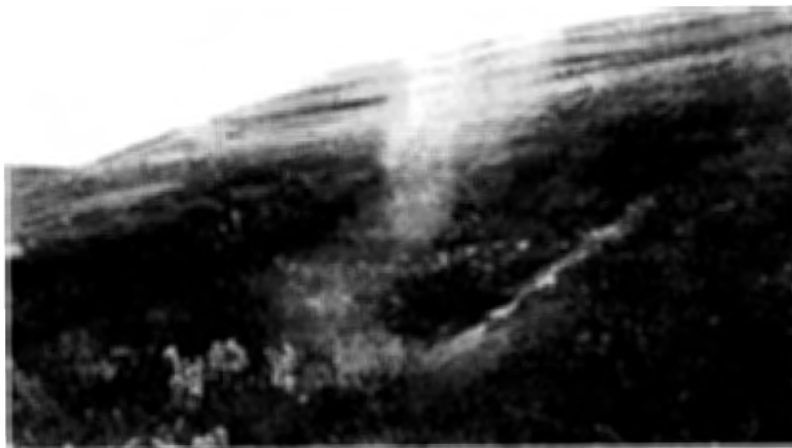
14

Pond for outfall 001-1.



15

Outfall 001-1 was not discharging.

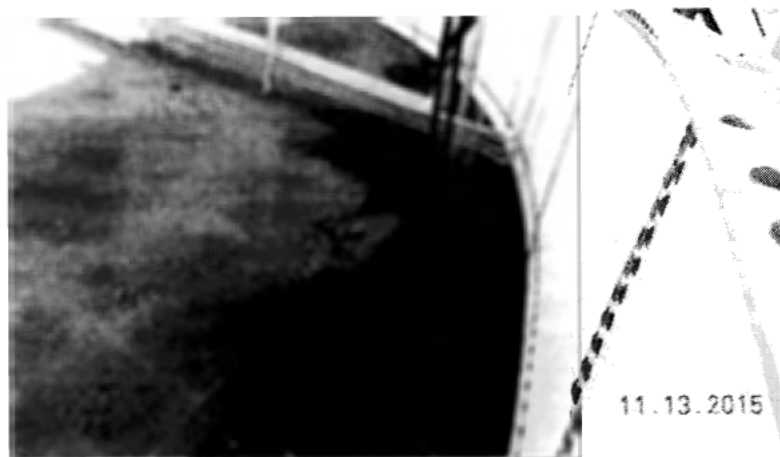


16

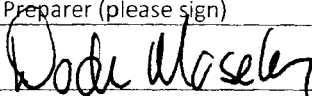
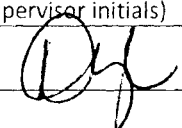
Structure 1000.



Inside of secondary containment structure.



NO ACTION MEMO TO FILE

Facility Name: Perry County Associates LLC Arrowhead Landfill		Permit No./Facility ID (required if applicable): ALG160167	Master ID: 17668
If unpermitted, Facility Address:		County (required): Perry (105)	
Compliance Documents Evaluated (Check all that apply)			
<input checked="" type="checkbox"/> DMR		Date(s): 2013, 2014, and 2015	
<input type="checkbox"/> SSO		Date(s):	
<input checked="" type="checkbox"/> Inspection Report		Date(s): November 13, 2015	
<input type="checkbox"/> Non-compliance Report		Date(s):	
<input checked="" type="checkbox"/> Annual Certifications		Date(s): 2013 and 2014	
<input checked="" type="checkbox"/> Other (describe): Complaint # 7K-002WD5E88 The Department received a complaint regarding a whitish storm water discharge.			
Compliance Determination (Describe noted deficiencies)		Rationale/Basis for No Action	
<input type="checkbox"/> Effluent Violations - List outfalls/parameters <u>Outfall</u> <u>Parameter</u>		<input type="checkbox"/> Effluent Violation - Insignificant/Short in Duration < 1.2 TRC (Conventional) < 1.4 TRC (Toxics) <input type="checkbox"/> Follow-up indicates non-compliance issues resolved (attach documentation) <input type="checkbox"/> Other Rationale/Basis (explain):	
<input type="checkbox"/> Monitoring/Reporting Violations (list below) <u>DMR</u> and/or <u>Parameter</u>		<input type="checkbox"/> Reporting Violation - Infrequent/Short in Duration <input type="checkbox"/> Follow-up indicates non-compliance issues resolved (attach documentation) <input type="checkbox"/> Other Rationale/Basis (explain):	
<input type="checkbox"/> Unpermitted Discharges - Describe		<input type="checkbox"/> Follow-up indicates non-compliance issues resolved (attach documentation) <input type="checkbox"/> Other Rationale/Basis (explain):	
<input type="checkbox"/> BMP Violations		<input type="checkbox"/> No BMP Plan <input type="checkbox"/> No Inspection log or training records <input type="checkbox"/> Other (explain):	
<input checked="" type="checkbox"/> Other Violations (list) The June 29, 2015 pH sample was analyzed outside of the holding time.		<input type="checkbox"/> Follow-up indicates non-compliance issues resolved (attach documentation) <input checked="" type="checkbox"/> Other Rationale/Basis (explain): The facility was notified to analyze ph according to established EPA methods. Sampling during the November 13, 2015 inspection showed an acceptable turbidity of 9.64 NTU. Therefore, no further action will be taken regarding Complaint # 7K-002WD5E88 by the Industrial General Permit Section at this time.	
Preparer (please sign) 	Date Signed 11-20-2015	Immediate Supervisor (initial) LW	Ready for Filenet? (Supervisor initials) 

CC: Dodi Moseley

H. LOWRY TRIBBLE, JR., P.E.
WILLIAM F. HODGES, P.E.
W. MICHAEL STUBBS, P.E.
R. BRANT LANE, P.E.
CLINT L. COURSON, CHMM
K. MATTHEW CHEEK, P.E.
DANIEL E. CHEEK, P.E.
KEVIN G. BERRY, P.E.

HHNT
— HODGES, HARBIN, —
NEWBERRY & TRIBBLE, INC.
Consulting Engineers

NATHAN D. DUNN, P.E.
RYAN S. WILLOUGHBY, P.E.
WILLIAM A. GRANICH, P.E.
ROBERT D. HELLER, CHMM
ERIC P. JACKSON, P.E.
DAVID E. BATTSON, P.E.
RYAN S. PETERS, P.E.
WILLIAM M. REESE, P.E.

January 4, 2016

Ms. Lee Warren
Alabama Department of Environmental Management
Industrial Section / Water Division
P.O. Box 301463
Montgomery, AL 36130-1463

**Re: Arrowhead Landfill
Storm Water Drainage Improvement Plan
NPDES Permit No. ALG160167
HHNT Project No. 3006-029-13**

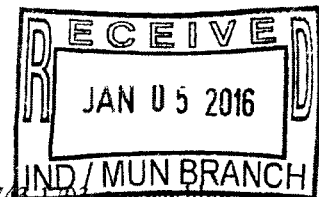
Dear Ms. Warren:

In response to recent citizen complaints and on behalf of Arrowhead Landfill, we have enclosed a plan sheet depicting planned storm water improvements on the southeastern portion of the property. The improvements include reversing the grade of the existing drainage ditch that runs along the corner of Cell 3 and discharges toward Cahaba Road. Instead of storm water runoff flowing south toward Cahaba Road and across the road to a tributary of Chilatchee Creek, the ditch will flow north to existing Sediment Pond No. 1. Discharges from Sediment Pond No. 1 will leave the site through the permitted Outfall No. 1 (DSN001-01, DSN003-02). Construction activities are planned for the first quarter of 2016 (weather permitting) and ADEM will be notified prior to construction initiation.

It is our understanding that these improvements will not require coverage under the NPDES Construction General Permit ALR100000 since the disturbed area will be less than one acre and not part of a common plan for development. It is also our understanding that these improvements will not require additional sampling (upstream/downstream turbidity, etc.) since the construction does not meet the definition of land disturbing activities described in the NPDES Industrial General Permit (i.e. the construction is not associated with opening and closing landfill cells or digging for cover).

It should be reiterated that the storm water runoff that has been leaving the facility property at Cahaba Road does not contain storm water runoff from areas of industrial activity and is therefore not regulated by the facility's NPDES Industrial General Permit. These improvements are not required, but are an effort to demonstrate Arrowhead Landfill's continued effort to being a good steward in the community.

Should you have any questions, please call.



Ms. Lee Warren
January 4, 2016
Page 2 of 2

Sincerely,

HODGES, HARBIN, NEWBERRY & TRIBBLE, INC.

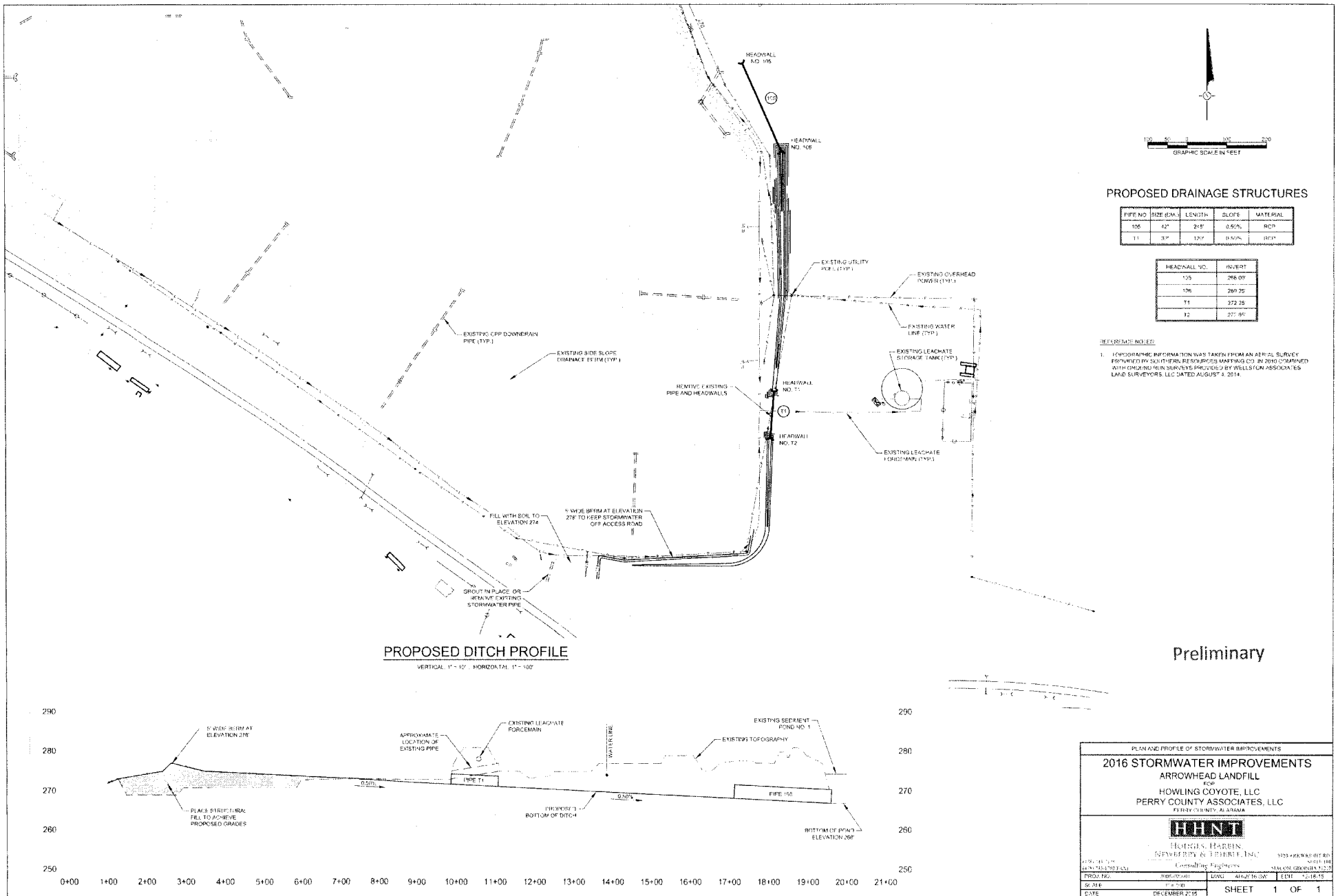


William F. Hodges, P.E.
Professional Engineer

WFH/tw

Enclosure

cc: Scott Story (w/ enclosure)
Brent Watson (w/ enclosure)
Dodi Moseley (w/ enclosure)
Evan Roberts (w/ enclosure)
Ernest Kaufmann (w/ enclosure)
Oscar Allen (w/ enclosure)
Thad Owings (w/ enclosure)
Joy Hammonds (w/ enclosure)
Johnny Sikes (w/ enclosure)



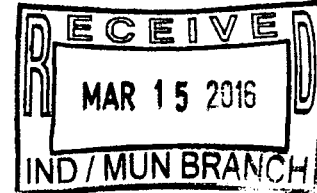
H. LOWRY TRIBBLE, JR., P.E.
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HHNT
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ERIC P. JACKSON, P.E.
DAVID E. BATTSON, P.E.
RYAN S. PETERS, P.E.
WILLIAM M. REESE, P.E.

March 14, 2016

Ms. Lee Warren
Alabama Department of Environmental Management
Industrial Section / Water Division
P.O. Box 301463
Montgomery, AL 36130-1463



Re: Arrowhead Landfill
Notification of Construction Project Commencement – Storm Water Ditch Re-grading
NPDES Permit No. ALG160167
HHNT Project No. 3006-029-13

Dear Ms. Warren:

This letter serves to notify your Section that the storm water ditch re-grading project started at Arrowhead Landfill today. This construction project was described in a letter to you on January 4, 2016 with a construction plan sheet attached showing planned storm water drainage improvements (re-attached to this letter for reference). We will notify your office upon project completion.

Should you have any questions, please call.

Sincerely,

HODGES, HARBIN, NEWBERRY & TRIBBLE, INC.

A handwritten signature in black ink, appearing to read "W. F. Hodges".

William F. Hodges, P.E.
Professional Engineer

WFH/tw

Enclosure

cc: Dodi Moseley (w/ enclosure)	Ernest Kaufman (w/ enclosure)
Evan Roberts (w/ enclosure)	Oscar Allen (w/ enclosure)
Brent Watson (w/ enclosure)	Thad Owings (w/ enclosure)
Shane Lovett (w/ enclosure)	Joy Hammonds (w/ enclosure)
Scott Story (w/ enclosure)	Johnny Sikes (w/ enclosure)
Jana Riley (w/ enclosure)	

H. LOWRY TRIBBLE, JR., P.E.
WILLIAM E. HODGES, P.E.
W. MICHAEL STUBBS, P.E.
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CELINE L. COURSON, CHMM
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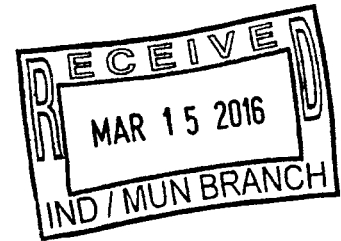


NATHAN D. DUNN, P.E.
RYAN S. WILTUGHBY, P.E.
WILLIAM A. GRANICH, P.E.
ROBERT D. HELLER, CHMM
ERIC P. JACKSON, P.E.
DAVID E. BAFFISON, P.E.
RYAN S. PETERS, P.E.
WILLIAM M. REESE, P.E.

January 4, 2016

Ms. Lee Warren
Alabama Department of Environmental Management
Industrial Section / Water Division
P.O. Box 301463
Montgomery, AL 36130-1463

**Re: Arrowhead Landfill
Storm Water Drainage Improvement Plan
NPDES Permit No. ALG160167
HHNT Project No. 3006-029-13**



Dear Ms. Warren:

In response to recent citizen complaints and on behalf of Arrowhead Landfill, we have enclosed a plan sheet depicting planned storm water improvements on the southeastern portion of the property. The improvements include reversing the grade of the existing drainage ditch that runs along the corner of Cell 3 and discharges toward Cahaba Road. Instead of storm water runoff flowing south toward Cahaba Road and across the road to a tributary of Chilatchee Creek, the ditch will flow north to existing Sediment Pond No. 1. Discharges from Sediment Pond No. 1 will leave the site through the permitted Outfall No. 1 (DSN001-01, DSN003-02). Construction activities are planned for the first quarter of 2016 (weather permitting) and ADEM will be notified prior to construction initiation.

It is our understanding that these improvements will not require coverage under the NPDES Construction General Permit ALR100000 since the disturbed area will be less than one acre and not part of a common plan for development. It is also our understanding that these improvements will not require additional sampling (upstream/downstream turbidity, etc.) since the construction does not meet the definition of land disturbing activities described in the NPDES Industrial General Permit (i.e. the construction is not associated with opening and closing landfill cells or digging for cover).

It should be reiterated that the storm water runoff that has been leaving the facility property at Cahaba Road does not contain storm water runoff from areas of industrial activity and is therefore not regulated by the facility's NPDES Industrial General Permit. These improvements are not required, but are an effort to demonstrate Arrowhead Landfill's continued effort to being a good steward in the community.

Should you have any questions, please call.

Ms. Lee Warren
January 4, 2016
Page 2 of 2

Sincerely,

HODGES, HARBIN, NEWBERRY & TRIBBLE, INC.

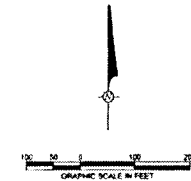
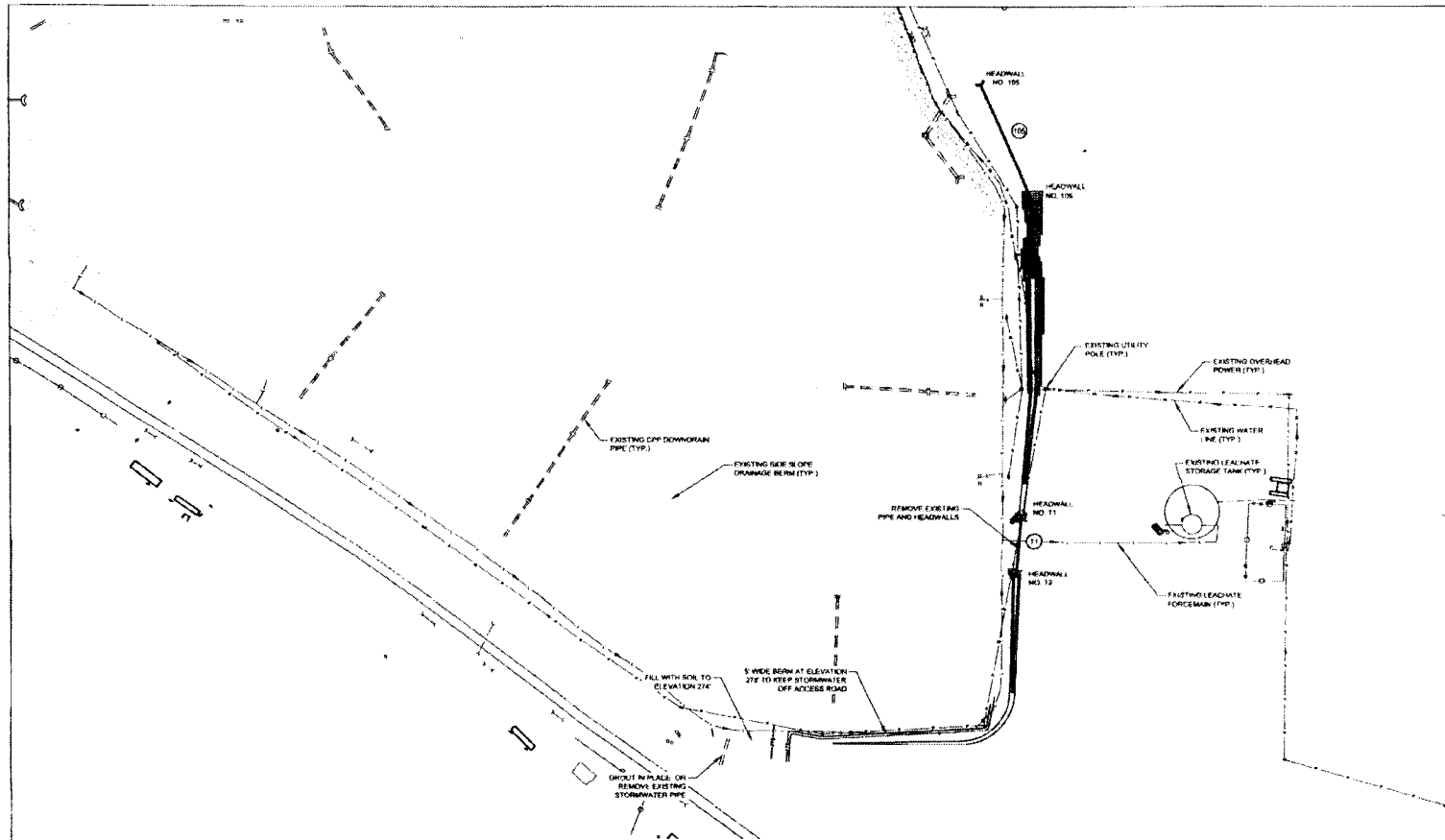


William F. Hodges, P.E.
Professional Engineer

WFH/tw

Enclosure

cc: Scott Story (w/ enclosure)
Brent Watson (w/ enclosure)
Dodi Moseley (w/ enclosure)
Evan Roberts (w/ enclosure)
Ernest Kaufmann (w/ enclosure)
Oscar Allen (w/ enclosure)
Thad Owings (w/ enclosure)
Joy Hammonds (w/ enclosure)
Johnny Sikes (w/ enclosure)



PROPOSED DRAINAGE STRUCTURES

PIPE NO.	SIZE (IN.)	LENGTH	SLOPE	MATERIAL
105	42"	248'	0.00%	PCP
11	30"	120'	0.50%	PCP

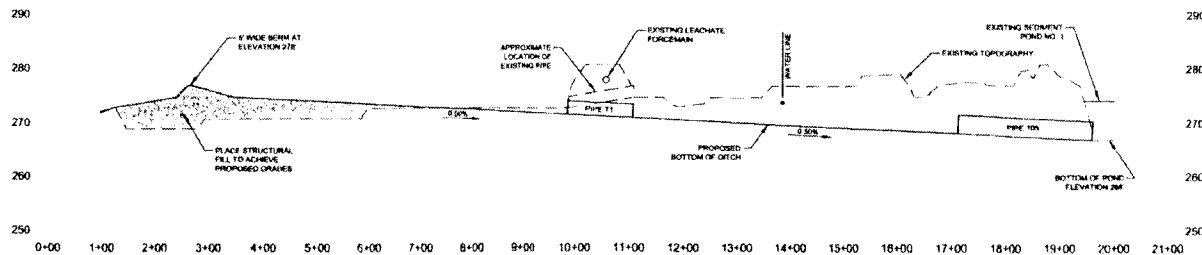
HEADWALL NO.	INVERT
105	268.50'
106	268.50'
11	272.25'
12	272.45'

REFERENCE NOTES

1. TOPOGRAPHIC INFORMATION WAS TAKEN FROM AN AERIAL REPERVEY PROVIDED BY SOUTHERN REPERVEY SERVICES (SRS) IN 2010 COMBINED WITH GROUND SURVEY DATA PROVIDED BY WILSON ASSOCIATES LAND SURVEYORS, LLC DATED AUGUST 4, 2014.

PROPOSED DITCH PROFILE

VERTICAL 1" = 10' HORIZONTAL 1" = 100'



Preliminary

PLAN AND PROFILE OF STORMWATER IMPROVEMENTS			
2016 STORMWATER IMPROVEMENTS			
ARROWHEAD LANDFILL			
FOR			
HOWLING COYOTE, LLC			
PERRY COUNTY ASSOCIATES, LLC			
PERRY COUNTY, ALABAMA			
HINT			
HODGES, HARRIN, & TRINBLE, INC.			
Consulting Engineers			
(478) 461-7171	2008-05-01	04/15/15	12/18/15
PROJECT NO.	DATE	BY	CHECKED
1" = 100'	DECEMBER 2015		
SHEET			1 OF 1

H. LOWRY TRIBBLE, JR., P.E.
WILLIAM F. HODGES, P.E.
W. MICHAEL STUBBS, P.E.
R. BRANT LANE, P.E.
CLINT L. COURSON, CHMM
K. MATTHEW CHEEK, P.E.
DANIEL E. CHEEK, P.E.
KEVIN G. BERRY, P.E.



NATHAN D. DUNN, P.E.
RYAN S. WILLOUGHBY, P.E.
WILLIAM A. GRANICH, P.E.
ROBERT D. HELLER, CHMM
ERIC P. JACKSON, P.E.
DAVID E. BATTSON, P.E.
RYAN S. PETERS, P.E.
WILLIAM M. REESE, P.E.

August 31, 2016

Ms. Lee Warren
Alabama Department of Environmental Management
Industrial Section / Water Division
P.O. Box 301463
Montgomery, AL 36130-1463

**Re: Arrowhead Landfill
Notification of Construction Project Completion – Storm Water Improvements
NPDES Permit No. ALG160167
HHNT Project No. 3006-029-13**

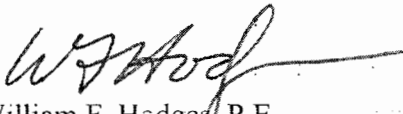
Dear Ms. Warren:

This letter serves to notify your Section that the storm water ditch re-grading project has been completed at Arrowhead Landfill. This construction project was described in a letter to you on January 4, 2016 with a construction plan sheet attached showing planned storm water drainage improvements, and your office was notified of project commencement on March 14, 2016. The pipe that previously directed storm water towards Cahaba Road was plugged in late March 2016, and there is no longer any discharge to the Cahaba Roadside Ditch from the Arrowhead Landfill Operations area. As shown on the plan and discussed previously, this ditch now directs storm water in this area to Sediment Pond No. 1. Enclosed is photographic documentation (photos taken August 18, 2016) of the storm water improvement project and stabilization of disturbed areas.

Should you have any questions, please call.

Sincerely,

HODGES, HARBIN, NEWBERRY & TRIBBLE, INC.



William F. Hodges, P.E.
Professional Engineer

WFH/mp

Enclosure

Ms. Lee Warren
August 31, 2016
Page 2 of 2

cc: Dodi Moseley (w/ enclosure)
Evan Roberts (w/ enclosure)
Heather Jones (w/ enclosure)
Shane Lovett (w/ enclosure)
Scott Story (w/ enclosure)
David Green (w/ enclosure)
Johnny Sikes (w/ enclosure)
Joy Hammonds (w/ enclosure)
Thad Owings (w/ enclosure)
Jana Riley (w/ enclosure)
Mike Smith (w/ enclosure)

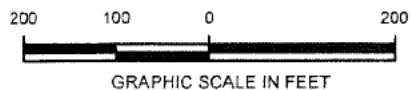


Photo Locations **Arrowhead Landfill**

Date: 8/30/2016

HHNT

HODGES, HARBIN,
NEWBERRY & TRIBBLE, INC.

Consulting Engineers

3920 Arkwright Road, Suite 101
Macon, Georgia 31210

Tel: (478) 743 -7175 Fax: (478) 743 -1703



PHOTO 1: Southwest Portion of Ditch Looking East



PHOTO 2: Southeast Portion of Ditch Looking East

Project No: 3006-029-13

Date Photos Taken: 8/18/2016

Figure 1 of 4

Arrowhead Landfill

**Storm Water Drainage
Improvements**



HODGES, HARBIN,
NEWBERRY & TRIBBLE, INC.
Consulting Engineers



PHOTO 3: Southeast Portion of Ditch Looking West



PHOTO 4: Northern Section of Ditch Looking North

Project No: 3006-029-13

Date Photos Taken: 8/18/2016

Figure 2 of 4

Arrowhead Landfill

**Storm Water Drainage
Improvements**

HHNT

HODGES, HARBIN,
NEWBERRY & TRIBBLE, INC.

Consulting Engineers



PHOTO 5: Downstream Pipe Outlet into Pond No. 1



PHOTO 6: Upstream Pipe Inlet / End of Ditch

Project No: 3006-029-13

Date Photos Taken: 8/18/2016

Figure 3 of 4

Arrowhead Landfill

**Storm Water Drainage
Improvements**

HHNT

HODGES, HARBIN,
NEWBERRY & TRIBBLE, INC.
Consulting Engineers



PHOTO 7: Southeast Portion of Ditch



PHOTO 8: Southwest Portion of Ditch

Project No: 3006-029-13

Date Photos Taken: 8/18/2016

Figure 4 of 4

Arrowhead Landfill

**Storm Water Drainage
Improvements**

HHNT

HODGES, HARBIN,
NEWBERRY & TRIBBLE, INC.
Consulting Engineers

LANCE R. LEFLEUR
DIRECTOR



Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

ROBERT J. BENTLEY
GOVERNOR

May 2, 2016

VIA FEDERALEX EXPRESS (NO. 8045 9790 3475)

Ms. Velveta Golightly-Howell, Director
U.S. Environmental Protection Agency
Office of Civil Rights
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460-1000

RE: ADEM Response to EPA Request for Information (Dated March 30, 2016 and Received April 18, 2016), EPA File Nos. 06R-03-R4, 12R-13-R4, and 13R-16-R4

Dear Ms. Golightly-Howell:

This is in response to your Request for Information on EPA File Nos. 06R-03-R4, 12R-13-R4, and 13R-16-R4. Enclosed is a USB Flash Drive containing the itemized responses and supporting electronic documents pursuant to your request. Please keep in mind that these itemized responses supplement and are in addition to the responses that ADEM has previously provided EPA pursuant to previous OCR requests in regard to EPA File Nos. 06R-03-R4 and 12R-13-R4. Additionally, ADEM reserves its rights to further supplement these responses and provide additional information during OCR's inquiry.

If you have any questions regarding this response and enclosure, please do not hesitate to contact Deputy Director Marilyn G. Elliott, at (334) 271-7700.

Sincerely,

Lance R. LeFleur
Director

LRL/ss/df

Enclosure: USB Flash Drive

MAY 03 2016

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Branch
2715 Sandlin Road, S.W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (FAX)



Mobile Branch
2204 Perimeter Road
Mobile, AL 36615-1131
(251) 450-3400
(251) 479-2593 (FAX)

Mobile-Coastal
3664 Dauphin Street, Suite B
Mobile, AL 36608
(251) 304-1176
(251) 304-1189 (FAX)

TTL, Inc

Primary/Secondary Inorganics (PSI)

Telephone 205-345-
0816
Fax 205-345-0992

Laboratory: TTL, Inc.
System: Uniontown Utilities Board
Source: Well 1 - Finished
Date Collected: 6/16/2015
TTL Lab Number: 150616023-001

Labid: 40170
Pwsid: 0001100
Sourceid:
Sample
Type (D/R):

Contaminant	Results, mg/L	Date Analyzed	MDL, mg/L	MCL, mg/L	Method	Code	Labid
Nitrogen, Nitrate, as NO3-N	< 0.10	6/16/2015	0.10	10	E300	1040	40170

The samples were analyzed in general accordance with methods outlined in Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020.

TTL, Inc

Primary/Secondary Inorganics (PSI)

Telephone 205-345-
0816
Fax 205-345-0992

Laboratory: TTL, Inc.
System: Uniontown Utilities Board
Source: Well 2 - Finished
Date Collected: 6/16/2015
TTL Lab Number: 150616023-002

Labid: 40170
Pwsid: 0001100
Sourceid:
Sample
Type (D/R):

Contaminant	Results, mg/L	Date Analyzed	MDL, mg/L	MCL, mg/L	Method	Code	Labid
Nitrogen, Nitrate, as NO3-N	< 0.10	6/16/2015	0.10	10	E300	1040	40170

The samples were analyzed in general accordance with methods outlined in Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020.

Laboratory: TTL, Inc.
System: Uniontown Utilities Board
Source: Well 1 - Finished
Date Collected: 6/16/2015
TTL Lab Number: 150616022-001

Labid: 40170
Pwsid: 0001100
Sourceid:
Sample Type (D/R):

Contaminant	Results, mg/L	Date Analyzed	MDL, mg/L	MCL, mg/L	Method	Code	Labid
2,4,5-TP (Silvex)	< 0.0001	6/29/2015	0.0001	0.05	E515.2	2110	40170
2,4-D	< 0.0010	6/29/2015	0.0010	0.07	E515.2	2105	40170
Alachlor	< 0.0010	7/6/2015	0.0010	0.002	E525.2	2051	40170
Atrazine	< 0.0010	7/6/2015	0.0010	0.003	E525.2	2050	40170
Benzo(a)pyrene	< 0.0001	7/6/2015	0.0001	0.0002	E525.2	2306	40170
Carbofuran	< 0.020	6/26/2015	0.020	0.04	E531.2	2046	40170
Chlordane	< 0.00100	6/18/2015	0.00100	0.002	E505	2959	40170
Dalapon	< 0.00200	6/23/2015	0.00200	0.2	E552.2	2031	40170
1,2-Dibromo-3-chloropropane	< 0.00001	6/24/2015	0.00001	0.0002	E504.1	2931	40170
bis(2-Ethylhexyl)adipate	< 0.0020	7/6/2015	0.0020	0.4	E525.2	2035	40170
Bis(2-ethylhexyl)phthalate	< 0.0020	7/6/2015	0.0020	0.006	E525.2	2039	40170
Dinoseb	< 0.0020	6/29/2015	0.0020	0.007	E515.2	2041	40170
Diquat	< 0.01	6/17/2015	0.01	0.02	E549.2	2932	40170
1,2-Dibromoethane	< 0.00001	6/24/2015	0.00001	0.00005	E504.1	2946	40170
Endothall	< 0.05	6/22/2015	0.05	0.1	E548.1	2033	40170
Endrin	< 0.00020	6/18/2015	0.00020	0.002	E505	2005	40170
Glyphosate	< 0.25	6/17/2015	0.25	0.7	E547	2034	40170
Heptachlor	< 0.00010	6/18/2015	0.00010	0.0004	E505	2065	40170
Heptachlor epoxide	< 0.00010	6/18/2015	0.00010	0.0002	E505	2067	40170
Hexachlorobenzene	< 0.00050	6/18/2015	0.00050	0.001	E505	2274	40170
Hexachlorocyclopentadiene	< 0.01000	6/18/2015	0.01000	0.05	E505	2042	40170
gamma-BHC	< 0.00010	6/18/2015	0.00010	0.0002	E505	2010	40170
Methoxychlor	< 0.00200	6/18/2015	0.00200	0.04	E505	2015	40170
Oxamyl	< 0.020	6/26/2015	0.020	0.2	E531.2	2036	40170
Total Polychlorinated Biphenyls	< 0.00025	6/18/2015	0.00025	0.0005	E505	2383	40170
Pentachlorophenol	< 0.0001	6/29/2015	0.0001	0.001	E515.2	2326	40170
Picloram	< 0.0020	6/29/2015	0.0020	0.5	E515.2	2040	40170
Simazine	< 0.0020	7/6/2015	0.0020	0.004	E525.2	2037	40170
Toxaphene	< 0.00100	6/18/2015	0.00100	0.003	E505	2020	40170

3-Hydroxycarbofuran	< 0.020	6/26/2015	0.020		E531.2	2066	40170
Aldicarb	< 0.020	6/26/2015	0.020		E531.2	2047	40170
Aldicarb sulfone	< 0.020	6/26/2015	0.020		E531.2	2044	40170
Aldicarb sulfoxide	< 0.020	6/26/2015	0.020		E531.2	2043	40170
Aldrin	< 0.00100	6/18/2015	0.00100		E505	2356	40170
Butachlor	< 0.01000	6/18/2015	0.01000		E505	2076	40170
Carbaryl	< 0.020	6/26/2015	0.020		E531.2	2021	40170
Dicamba	< 0.0020	6/29/2015	0.0020		E515.2	2440	40170
Dieldrin	< 0.00100	6/18/2015	0.00100		E505	2070	40170
Methomyl	< 0.020	6/26/2015	0.020		E531.2	2022	40170
Metolachlor	< 0.01000	6/18/2015	0.01000		E505	2045	40170
Metr buzin	< 0.00200	6/18/2015	0.00200		E505	2595	40170
Propachlor	< 0.00200	6/18/2015	0.00200		E505	2077	40170

The samples were analyzed in general accordance with methods outlined in Methods for the Determination of Organic Compounds in Drinking Water, EMSL-Cincinnati, EPA/600/4-88/039 and EPA/600/4-90/020.

Laboratory: TTL, Inc.
System: Uniontown Utilities Board
Source: Well 2 - Finished
Date Collected: 6/16/2015
TTL Lab Number: 150616022-002

Labid: 40170
Pwsid: 0001100
Sourceid:
Sample Type (D/R):

Contaminant	Results, mg/L	Date Analyzed	MDL, mg/L	MCL, mg/L	Method	Code	Labid
2,4,5-TP (Silvex)	< 0.0001	6/30/2015	0.0001	0.05	E515.2	2110	40170
2,4-D	< 0.0010	6/30/2015	0.0010	0.07	E515.2	2105	40170
Alachlor	< 0.0010	7/6/2015	0.0010	0.002	E525.2	2051	40170
Atrazine	< 0.0010	7/6/2015	0.0010	0.003	E525.2	2050	40170
Benzo(a)pyrene	< 0.0001	7/6/2015	0.0001	0.0002	E525.2	2306	40170
Carbofuran	< 0.020	6/26/2015	0.020	0.04	E531.2	2046	40170
Chlordane	< 0.00100	6/18/2015	0.00100	0.002	E505	2959	40170
Dalapon	< 0.00200	6/23/2015	0.00200	0.2	E552.2	2031	40170
1,2-Dibromo-3-chloropropane	< 0.00001	6/24/2015	0.00001	0.0002	E504.1	2931	40170
bis(2-Ethylhexyl)adipate	< 0.0020	7/6/2015	0.0020	0.4	E525.2	2035	40170
Bis(2-ethylhexyl)phthalate	< 0.0020	7/6/2015	0.0020	0.006	E525.2	2039	40170
Dinoseb	< 0.0020	6/30/2015	0.0020	0.007	E515.2	2041	40170
Diquat	< 0.01	6/17/2015	0.01	0.02	E549.2	2932	40170
1,2-Dibromoethane	< 0.00001	6/24/2015	0.00001	0.00005	E504.1	2946	40170
Endothall	< 0.05	6/22/2015	0.05	0.1	E548.1	2033	40170
Endrin	< 0.00020	6/18/2015	0.00020	0.002	E505	2005	40170
Glyphosate	< 0.25	6/17/2015	0.25	0.7	E547	2034	40170
Heptachlor	< 0.00010	6/18/2015	0.00010	0.0004	E505	2065	40170
Heptachlor epoxide	< 0.00010	6/18/2015	0.00010	0.0002	E505	2067	40170
Hexachlorobenzene	< 0.00050	6/18/2015	0.00050	0.001	E505	2274	40170
Hexachlorocyclopentadiene	< 0.01000	6/18/2015	0.01000	0.05	E505	2042	40170
gamma-BHC	< 0.00010	6/18/2015	0.00010	0.0002	E505	2010	40170
Methoxychlor	< 0.00200	6/18/2015	0.00200	0.04	E505	2015	40170
Oxamyl	< 0.020	6/26/2015	0.020	0.2	E531.2	2036	40170
Total Polychlorinated Biphenyls	< 0.00025	6/18/2015	0.00025	0.0005	E505	2383	40170
Pentachlorophenol	< 0.0001	6/30/2015	0.0001	0.001	E515.2	2326	40170
Picloram	< 0.0020	6/30/2015	0.0020	0.5	E515.2	2040	40170
Simazine	< 0.0020	7/6/2015	0.0020	0.004	E525.2	2037	40170
Toxaphene	< 0.00100	6/18/2015	0.00100	0.003	E505	2020	40170

3-Hydroxycarbofuran	< 0.020	6/26/2015	0.020		E531.2	2066	40170
Aldicarb	< 0.020	6/26/2015	0.020		E531.2	2047	40170
Aldicarb sulfone	< 0.020	6/26/2015	0.020		E531.2	2044	40170
Aldicarb sulfoxide	< 0.020	6/26/2015	0.020		E531.2	2043	40170
Aldrin	< 0.00100	6/18/2015	0.00100		E505	2356	40170
Butachlor	< 0.01000	6/18/2015	0.01000		E505	2076	40170
Carbaryl	< 0.020	6/26/2015	0.020		E531.2	2021	40170
Dicamba	< 0.0020	6/30/2015	0.0020		E515.2	2440	40170
Dieldrin	< 0.00100	6/18/2015	0.00100		E505	2070	40170
Methomyl	< 0.020	6/26/2015	0.020		E531.2	2022	40170
Metolachlor	< 0.01000	6/18/2015	0.01000		E505	2045	40170
Metr buzin	< 0.00200	6/18/2015	0.00200		E505	2595	40170
Propachlor	< 0.00200	6/18/2015	0.00200		E505	2077	40170

The samples were analyzed in general accordance with methods outlined in Methods for the Determination of Organic Compounds in Drinking Water, EMSL-Cincinnati, EPA/600/4-88/039 and EPA/600/4-90/020.

TTL, Inc

Synthetic Organic Chemicals (SOCs)

Telephone 205-345-0816
Fax 205-345-0992

Laboratory: TTL, Inc.
System: Uniontown Utilities Board
Source: Trip Blank
Date Collected: 6/16/2015
TTL Lab Number: 150616022-003

Labid: 40170
Pwsid: 0001100
Sourceid:
Sample
Type (D/R):

Contaminant	Results, mg/L	Date Analyzed	MDL, mg/L	MCL, mg/L	Method	Code	Labid
Glyphosate	< 0.25	6/17/2015	0.25	0.7	E547	2034	40170

The samples were analyzed in general accordance with methods outlined in Methods for the Determination of Organic Compounds in Drinking Water, EMSL-Cincinnati, EPA/600/4-88/039 and EPA/600/4-90/020.

Laboratory: TTL, Inc.
System: Uniontown Utilities Board
Source: Well 1 - Finished
Date Collected: 6/16/2015
TTL Lab Number: 150616021-001

Labid: 40170
Pwsid: 0001100
Sourceid:
Sample Type (D/R):

Contaminant	Results, µg/L	Date Analyzed	MDL, µg/L	MCL, mg/L	Method	Code	Labid
1,1,1-Trichloroethane	< 0.500	6/23/2015	0.500	0.2	E524.2	2981	40170
1,1,2-Trichloroethane	< 0.500	6/23/2015	0.500	0.005	E524.2	2985	40170
1,1-Dichloroethene	< 0.500	6/23/2015	0.500	0.007	E524.2	2977	40170
1,2,4-Trichlorobenzene	< 0.500	6/23/2015	0.500	0.07	E524.2	2378	40170
1,2-Dichloroethane	< 0.500	6/23/2015	0.500	0.005	E524.2	2980	40170
1,2-Dichloropropane	< 0.500	6/23/2015	0.500	0.005	E524.2	2983	40170
Benzene	< 0.500	6/23/2015	0.500	0.005	E524.2	2990	40170
Carbon tetrachloride	< 0.500	6/23/2015	0.500	0.005	E524.2	2982	40170
cis-1,2-Dichloroethene	< 0.500	6/23/2015	0.500	0.07	E524.2	2380	40170
Ethy benzene	< 0.500	6/23/2015	0.500	0.7	E524.2	2992	40170
Methylene chloride	< 0.500	6/23/2015	0.500	0.005	E524.2	2964	40170
Chlorobenzene	< 0.500	6/23/2015	0.500	0.1	E524.2	2989	40170
1,2-Dichlorobenzene	< 0.500	6/23/2015	0.500	0.6	E524.2	2968	40170
1,4-Dichlorobenzene	< 0.500	6/23/2015	0.500	0.075	E524.2	2969	40170
Styrene	< 0.500	6/23/2015	0.500	0.1	E524.2	2996	40170
Trichloroethene	< 0.500	6/23/2015	0.500	0.005	E524.2	2984	40170
Tetrachloroethene	< 0.500	6/23/2015	0.500	0.005	E524.2	2987	40170
Toluene	< 0.500	6/23/2015	0.500	1	E524.2	2991	40170
trans-1,2-Dichloroethene	< 0.500	6/23/2015	0.500	0.1	E524.2	2979	40170
Vinyl chloride	< 0.500	6/23/2015	0.500	0.002	E524.2	2976	40170
Xylenes	< 0.500	6/23/2015	0.500	10	E524.2	2955	40170

1,1-Dichloropropene	< 0.500	6/23/2015	0.500		E524.2	2410	40170
1,1,1,2-Tetrachloroethane	< 0.500	6/23/2015	0.500		E524.2	2986	40170
1,1,2,2-Tetrachloroethane	< 0.500	6/23/2015	0.500		E524.2	2988	40170
1,1-Dichloroethane	< 0.500	6/23/2015	0.500		E524.2	2978	40170
1,2,3-Trichlorobenzene	< 0.500	6/23/2015	0.500		E524.2	2420	40170
1,2,3-Trichloropropane	< 0.500	6/23/2015	0.500		E524.2	2414	40170
1,2,4-Trimethylbenzene	< 0.500	6/23/2015	0.500		E524.2	2418	40170
1,3-Dichloropropane	< 0.500	6/23/2015	0.500		E524.2	2412	40170
1,3-Dichloropropene	< 0.500	6/23/2015	0.500		E524.2	2413	40170
1,3,5-Trimethylbenzene	< 0.500	6/23/2015	0.500		E524.2	2424	40170
2,2-Dichloropropane	< 0.500	6/23/2015	0.500		E524.2	2416	40170
Bromobenzene	< 0.500	6/23/2015	0.500		E524.2	2993	40170
Bromochloromethane	< 0.500	6/23/2015	0.500		E524.2	2430	40170
Bromodichloromethane	< 0.500	6/23/2015	0.500		E524.2	2943	40170
Bromoform	< 0.500	6/23/2015	0.500		E524.2	2942	40170
Bromomethane	< 0.500	6/23/2015	0.500		E524.2	2214	40170
Chloroethane	< 0.500	6/23/2015	0.500		E524.2	2216	40170
Chloroform	< 0.500	6/23/2015	0.500		E524.2	2941	40170
Chloromethane	< 0.500	6/23/2015	0.500		E524.2	2210	40170
Dibromochloromethane	< 0.500	6/23/2015	0.500		E524.2	2944	40170
Dibromomethane	< 0.500	6/23/2015	0.500		E524.2	2408	40170

All information (written or electronic) from TTL concerning TTL's work is for the sole use and reliance of TTL's Client. TTL intends no third party beneficiaries (express or implied) and copies of such information received by any third parties are NOT for reliance unless TTL first receives a signed Secondary Client Agreement from the third party.
Copyright ©2015 TTL, Inc. All rights reserved.

Laboratory: TTL, Inc.
System: Uniontown Utilities Board
Source: Well 1 - Finished
Date Collected: 6/16/2015
TTL Lab Number: 150616021-001

Labid: 40170
Pwsid: 0001100
Sourceid:
Sample Type (D/R):

Contaminant	Results, µg/L	Date Analyzed	MDL, µg/L	MCL, mg/L	Method	Code	Labid
Dichlorodifluoromethane	< 0.500	6/23/2015	0.500		E524.2	2212	40170
Hexachlorobutadiene	< 0.500	6/23/2015	0.500		E524.2	2246	40170
Isopropyl benzene	< 0.500	6/23/2015	0.500		E524.2	2994	40170
1,3-Dichlorobenzene	< 0.500	6/23/2015	0.500		E524.2	2967	40170
Methyl tert-butyl ether	< 2.00	6/23/2015	2.00		E524.2	2251	40170
n-Butyl benzene	< 0.500	6/23/2015	0.500		E524.2	2422	40170
Naphthalene	< 0.500	6/23/2015	0.500		E524.2	2248	40170
n-Propylbenzene	< 0.500	6/23/2015	0.500		E524.2	2998	40170
2-Chlorotoluene	< 0.500	6/23/2015	0.500		E524.2	2965	40170
4-Chlorotoluene	< 0.500	6/23/2015	0.500		E524.2	2966	40170
4-Isopropyltoluene	< 0.500	6/23/2015	0.500		E524.2	2030	40170
sec-Butyl benzene	< 0.500	6/23/2015	0.500		E524.2	2428	40170
tert-Butylbenzene	< 0.500	6/23/2015	0.500		E524.2	2426	40170
Trichlorofluoromethane	< 0.500	6/23/2015	0.500		E524.2	2218	40170

The samples were analyzed in general accordance with methods outlined in Methods for the Determination of Organic Compounds in Drinking Water, EMSL-Cincinnati, EPA/600/4-88/039 and EPA/600/4-90/020.

Laboratory: TTL, Inc.
System: Uniontown Utilities Board
Source: Well 2 - Finished
Date Collected: 6/16/2015
TTL Lab Number: 150616021-002

Labid: 40170
Pwsid: 0001100
Sourceid:
Sample Type (D/R):

Contaminant	Results, µg/L	Date Analyzed	MDL, µg/L	MCL, mg/L	Method	Code	Labid
1,1,1-Trichloroethane	< 0.500	6/30/2015	0.500	0.2	E524.2	2981	40170
1,1,2-Trichloroethane	< 0.500	6/30/2015	0.500	0.005	E524.2	2985	40170
1,1-Dichloroethene	< 0.500	6/30/2015	0.500	0.007	E524.2	2977	40170
1,2,4-Trichlorobenzene	< 0.500	6/30/2015	0.500	0.07	E524.2	2378	40170
1,2-Dichloroethane	< 0.500	6/30/2015	0.500	0.005	E524.2	2980	40170
1,2-Dichloropropane	< 0.500	6/30/2015	0.500	0.005	E524.2	2983	40170
Benzene	< 0.500	6/30/2015	0.500	0.005	E524.2	2990	40170
Carbon tetrachloride	< 0.500	6/30/2015	0.500	0.005	E524.2	2982	40170
cis-1,2-Dichloroethene	< 0.500	6/30/2015	0.500	0.07	E524.2	2380	40170
Ethy benzene	< 0.500	6/30/2015	0.500	0.7	E524.2	2992	40170
Methylene chloride	< 0.500	6/30/2015	0.500	0.005	E524.2	2964	40170
Chlorobenzene	< 0.500	6/30/2015	0.500	0.1	E524.2	2989	40170
1,2-Dichlorobenzene	< 0.500	6/30/2015	0.500	0.6	E524.2	2968	40170
1,4-Dichlorobenzene	< 0.500	6/30/2015	0.500	0.075	E524.2	2969	40170
Styrene	< 0.500	6/30/2015	0.500	0.1	E524.2	2996	40170
Trichloroethene	< 0.500	6/30/2015	0.500	0.005	E524.2	2984	40170
Tetrachloroethene	< 0.500	6/30/2015	0.500	0.005	E524.2	2987	40170
Toluene	< 0.500	6/30/2015	0.500	1	E524.2	2991	40170
trans-1,2-Dichloroethene	< 0.500	6/30/2015	0.500	0.1	E524.2	2979	40170
Vinyl chloride	< 0.500	6/30/2015	0.500	0.002	E524.2	2976	40170
Xylenes	< 0.500	6/30/2015	0.500	10	E524.2	2955	40170

1,1-Dichloropropene	< 0.500	6/30/2015	0.500		E524.2	2410	40170
1,1,1,2-Tetrachloroethane	< 0.500	6/30/2015	0.500		E524.2	2986	40170
1,1,2,2-Tetrachloroethane	< 0.500	6/30/2015	0.500		E524.2	2988	40170
1,1-Dichloroethane	< 0.500	6/30/2015	0.500		E524.2	2978	40170
1,2,3-Trichlorobenzene	< 0.500	6/30/2015	0.500		E524.2	2420	40170
1,2,3-Trichloropropane	< 0.500	6/30/2015	0.500		E524.2	2414	40170
1,2,4-Trimethylbenzene	< 0.500	6/30/2015	0.500		E524.2	2418	40170
1,3-Dichloropropane	< 0.500	6/30/2015	0.500		E524.2	2412	40170
1,3-Dichloropropene	< 0.500	6/30/2015	0.500		E524.2	2413	40170
1,3,5-Trimethylbenzene	< 0.500	6/30/2015	0.500		E524.2	2424	40170
2,2-Dichloropropane	< 0.500	6/30/2015	0.500		E524.2	2416	40170
Bromobenzene	< 0.500	6/30/2015	0.500		E524.2	2993	40170
Bromochloromethane	< 0.500	6/30/2015	0.500		E524.2	2430	40170
Bromodichloromethane	< 0.500	6/30/2015	0.500		E524.2	2943	40170
Bromoform	< 0.500	6/30/2015	0.500		E524.2	2942	40170
Bromomethane	< 0.500	6/30/2015	0.500		E524.2	2214	40170
Chloroethane	< 0.500	6/30/2015	0.500		E524.2	2216	40170
Chloroform	< 0.500	6/30/2015	0.500		E524.2	2941	40170
Chloromethane	< 0.500	6/30/2015	0.500		E524.2	2210	40170
Dibromochloromethane	< 0.500	6/30/2015	0.500		E524.2	2944	40170
Dibromomethane	< 0.500	6/30/2015	0.500		E524.2	2408	40170

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Laboratory: TTL, Inc.
System: Uniontown Utilities Board
Source: Well 2 - Finished
Date Collected: 6/16/2015
TTL Lab Number: 150616021-002

Labid: 40170
Pwsid: 0001100
Sourceid:
Sample Type (D/R):

Contaminant	Results, µg/L	Date Analyzed	MDL, µg/L	MCL, mg/L	Method	Code	Labid
Dichlorodifluoromethane	< 0.500	6/30/2015	0.500		E524.2	2212	40170
Hexachlorobutadiene	< 0.500	6/30/2015	0.500		E524.2	2246	40170
Isopropyl benzene	< 0.500	6/30/2015	0.500		E524.2	2994	40170
1,3-Dichlorobenzene	< 0.500	6/30/2015	0.500		E524.2	2967	40170
Methyl tert-butyl ether	< 2.00	6/30/2015	2.00		E524.2	2251	40170
n-Butyl benzene	< 0.500	6/30/2015	0.500		E524.2	2422	40170
Naphthalene	< 0.500	6/30/2015	0.500		E524.2	2248	40170
n-Propylbenzene	< 0.500	6/30/2015	0.500		E524.2	2998	40170
2-Chlorotoluene	< 0.500	6/30/2015	0.500		E524.2	2965	40170
4-Chlorotoluene	< 0.500	6/30/2015	0.500		E524.2	2966	40170
4-Isopropyltoluene	< 0.500	6/30/2015	0.500		E524.2	2030	40170
sec-Butyl benzene	< 0.500	6/30/2015	0.500		E524.2	2428	40170
tert-Butylbenzene	< 0.500	6/30/2015	0.500		E524.2	2426	40170
Trichlorofluoromethane	< 0.500	6/30/2015	0.500		E524.2	2218	40170

The samples were analyzed in general accordance with methods outlined in Methods for the Determination of Organic Compounds in Drinking Water, EMSL-Cincinnati, EPA/600/4-88/039 and EPA/600/4-90/020.

Laboratory: TTL, Inc.
System: Uniontown Utilities Board
Source: Trip Blank
Date Collected: 6/16/2015
TTL Lab Number: 150616021-003

Labid: 40170
Pwsid: 0001100
Sourceid:
Sample Type (D/R):

Contaminant	Results, µg/L	Date Analyzed	MDL, µg/L	MCL, mg/L	Method	Code	Labid
1,1,1-Trichloroethane	< 0.500	6/23/2015	0.500	0.2	E524.2	2981	40170
1,1,2-Trichloroethane	< 0.500	6/23/2015	0.500	0.005	E524.2	2985	40170
1,1-Dichloroethene	< 0.500	6/23/2015	0.500	0.007	E524.2	2977	40170
1,2,4-Trichlorobenzene	< 0.500	6/23/2015	0.500	0.07	E524.2	2378	40170
1,2-Dichloroethane	< 0.500	6/23/2015	0.500	0.005	E524.2	2980	40170
1,2-Dichloropropane	< 0.500	6/23/2015	0.500	0.005	E524.2	2983	40170
Benzene	< 0.500	6/23/2015	0.500	0.005	E524.2	2990	40170
Carbon tetrachloride	< 0.500	6/23/2015	0.500	0.005	E524.2	2982	40170
cis-1,2-Dichloroethene	< 0.500	6/23/2015	0.500	0.07	E524.2	2380	40170
Ethy benzene	< 0.500	6/23/2015	0.500	0.7	E524.2	2992	40170
Methylene chloride	< 0.500	6/23/2015	0.500	0.005	E524.2	2964	40170
Chlorobenzene	< 0.500	6/23/2015	0.500	0.1	E524.2	2989	40170
1,2-Dichlorobenzene	< 0.500	6/23/2015	0.500	0.6	E524.2	2968	40170
1,4-Dichlorobenzene	< 0.500	6/23/2015	0.500	0.075	E524.2	2969	40170
Styrene	< 0.500	6/23/2015	0.500	0.1	E524.2	2996	40170
Trichloroethene	< 0.500	6/23/2015	0.500	0.005	E524.2	2984	40170
Tetrachloroethene	< 0.500	6/23/2015	0.500	0.005	E524.2	2987	40170
Toluene	< 0.500	6/23/2015	0.500	1	E524.2	2991	40170
trans-1,2-Dichloroethene	< 0.500	6/23/2015	0.500	0.1	E524.2	2979	40170
Vinyl chloride	< 0.500	6/23/2015	0.500	0.002	E524.2	2976	40170
Xylenes	< 0.500	6/23/2015	0.500	10	E524.2	2955	40170

1,1-Dichloropropene	< 0.500	6/23/2015	0.500		E524.2	2410	40170
1,1,1,2-Tetrachloroethane	< 0.500	6/23/2015	0.500		E524.2	2986	40170
1,1,2,2-Tetrachloroethane	< 0.500	6/23/2015	0.500		E524.2	2988	40170
1,1-Dichloroethane	< 0.500	6/23/2015	0.500		E524.2	2978	40170
1,2,3-Trichlorobenzene	< 0.500	6/23/2015	0.500		E524.2	2420	40170
1,2,3-Trichloropropane	< 0.500	6/23/2015	0.500		E524.2	2414	40170
1,2,4-Trimethylbenzene	< 0.500	6/23/2015	0.500		E524.2	2418	40170
1,3-Dichloropropane	< 0.500	6/23/2015	0.500		E524.2	2412	40170
1,3-Dichloropropene	< 0.500	6/23/2015	0.500		E524.2	2413	40170
1,3,5-Trimethylbenzene	< 0.500	6/23/2015	0.500		E524.2	2424	40170
2,2-Dichloropropane	< 0.500	6/23/2015	0.500		E524.2	2416	40170
Bromobenzene	< 0.500	6/23/2015	0.500		E524.2	2993	40170
Bromochloromethane	< 0.500	6/23/2015	0.500		E524.2	2430	40170
Bromodichloromethane	< 0.500	6/23/2015	0.500		E524.2	2943	40170
Bromoform	< 0.500	6/23/2015	0.500		E524.2	2942	40170
Bromomethane	< 0.500	6/23/2015	0.500		E524.2	2214	40170
Chloroethane	< 0.500	6/23/2015	0.500		E524.2	2216	40170
Chloroform	< 0.500	6/23/2015	0.500		E524.2	2941	40170
Chloromethane	< 0.500	6/23/2015	0.500		E524.2	2210	40170
Dibromochloromethane	< 0.500	6/23/2015	0.500		E524.2	2944	40170
Dibromomethane	< 0.500	6/23/2015	0.500		E524.2	2408	40170

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Laboratory: TTL, Inc.
System: Uniontown Utilities Board
Source: Trip Blank
Date Collected: 6/16/2015
TTL Lab Number: 150616021-003

Labid: 40170
Pwsid: 0001100
Sourceid:
Sample Type (D/R):

Contaminant	Results, µg/L	Date Analyzed	MDL, µg/L	MCL, mg/L	Method	Code	Labid
Dichlorodifluoromethane	< 0.500	6/23/2015	0.500		E524.2	2212	40170
Hexachlorobutadiene	< 0.500	6/23/2015	0.500		E524.2	2246	40170
Isopropyl benzene	< 0.500	6/23/2015	0.500		E524.2	2994	40170
1,3-Dichlorobenzene	< 0.500	6/23/2015	0.500		E524.2	2967	40170
Methyl tert-butyl ether	< 2.00	6/23/2015	2.00		E524.2	2251	40170
n-Butyl benzene	< 0.500	6/23/2015	0.500		E524.2	2422	40170
Naphthalene	< 0.500	6/23/2015	0.500		E524.2	2248	40170
n-Propylbenzene	< 0.500	6/23/2015	0.500		E524.2	2998	40170
2-Chlorotoluene	< 0.500	6/23/2015	0.500		E524.2	2965	40170
4-Chlorotoluene	< 0.500	6/23/2015	0.500		E524.2	2966	40170
4-Isopropyltoluene	< 0.500	6/23/2015	0.500		E524.2	2030	40170
sec-Butyl benzene	< 0.500	6/23/2015	0.500		E524.2	2428	40170
tert-Butylbenzene	< 0.500	6/23/2015	0.500		E524.2	2426	40170
Trichlorofluoromethane	< 0.500	6/23/2015	0.500		E524.2	2218	40170

The samples were analyzed in general accordance with methods outlined in Methods for the Determination of Organic Compounds in Drinking Water, EMSL-Cincinnati, EPA/600/4-88/039 and EPA/600/4-90/020.

TTL, Inc

Disinfection Byproducts - HAA5s by EPA Method 552.

Telephone 205-345-0816
Fax 205-345-0992

Laboratory: TTL, Inc.
System: Uniontown Utilities Board
Date Collected: 9/18/2015
Date Analyzed: 9/24/2015

Labid: 40170
Pwsid: 1100
TTL Lab Number: 150918062

Location	Type (M or R)	Chloroacetic acid, µg/L	Bromoacetic acid, µg/L	Dichloroacetic acid, µg/L	Trichloroacetic acid, µg/L	Dibromoacetic acid, µg/L	Total Haloacetic Acids, µg/L
Site 1 - 1871 Golf Course Road (Highway 183 North)		< 2.00	< 1.00	1.18	< 1.00	< 1.00	1.18
Site 2 - 3355 Kelley Files Road (County Road 65 S)		< 2.00	< 1.00	< 1.00	< 1.00	< 1.00	< 1.00

TTL, Inc

Disinfection Byproducts - TTHMs by EPA Method 524.

Telephone 205-345-0816
Fax 205-345-0992

Laboratory: TTL, Inc.
System: Uniontown Utilities Board
Date Collected: 9/18/2015
Date Analyzed: 9/22/2015

Labid: 40170
Pwsid: 1100
TTL Lab Number: 150918062

Location	Type (M or R)	Chloroform, µg/L	Bromodichloro methane, µg/L	Dibromochloro methane, µg/L	Bromoform, µg/L	Total Trihalomethanes, µg/L
Site 1 - 1871 Golf Course Road (Highway 183 North)		1.71	< 1.00	< 1.00	< 1.00	1.71
Site 2 - 3355 Kelley Files Road (County Road 65 S)		1.53	1.07	< 1.00	< 1.00	2.60
Trip Blank		< 1.00	< 1.00	< 1.00	< 1.00	< 1.00

Laboratory: TTL, Inc.
System: Uniontown Utilities Board
Source: Well 1 - Finished
Date Collected: 9/18/2015
TTL Lab Number: 150918061-001

Labid: 40170
Pwsid: 0001100
Sourceid:
Sample Type (D/R):

Contaminant	Results, mg/L	Date Analyzed	MDL, mg/L	MCL, mg/L	Method	Code	Labid
2,4,5-TP (Silvex)	< 0.0001	9/30/2015	0.0001	0.05	E515.2	2110	40170
2,4-D	< 0.0010	9/30/2015	0.0010	0.07	E515.2	2105	40170
Alachlor	< 0.0010	9/29/2015	0.0010	0.002	E525.2	2051	40170
Atrazine	< 0.0010	9/29/2015	0.0010	0.003	E525.2	2050	40170
Benzo(a)pyrene	< 0.0001	9/29/2015	0.0001	0.0002	E525.2	2306	40170
Carbofuran	< 0.020	9/21/2015	0.020	0.04	E531.2	2046	40170
Chlordane	< 0.00100	9/21/2015	0.00100	0.002	E505	2959	40170
Dalapon	< 0.00200	9/25/2015	0.00200	0.2	E552.2	2031	40170
1,2-Dibromo-3-chloropropane	< 0.00001	9/29/2015	0.00001	0.0002	E504.1	2931	40170
bis(2-Ethylhexyl)adipate	< 0.0020	9/29/2015	0.0020	0.4	E525.2	2035	40170
Bis(2-ethylhexyl)phthalate	< 0.0020	9/29/2015	0.0020	0.006	E525.2	2039	40170
Dinoseb	< 0.0020	9/30/2015	0.0020	0.007	E515.2	2041	40170
Diquat	< 0.01	9/29/2015	0.01	0.02	E549.2	2932	40170
1,2-Dibromoethane	< 0.00001	9/29/2015	0.00001	0.00005	E504.1	2946	40170
Endothall	< 0.05	9/24/2015	0.05	0.1	E548.1	2033	40170
Endrin	< 0.00020	9/21/2015	0.00020	0.002	E505	2005	40170
Glyphosate	< 0.25	9/28/2015	0.25	0.7	E547	2034	40170
Heptachlor	< 0.00010	9/21/2015	0.00010	0.0004	E505	2065	40170
Heptachlor epoxide	< 0.00010	9/21/2015	0.00010	0.0002	E505	2067	40170
Hexachlorobenzene	< 0.00050	9/21/2015	0.00050	0.001	E505	2274	40170
Hexachlorocyclopentadiene	< 0.01000	9/21/2015	0.01000	0.05	E505	2042	40170
gamma-BHC	< 0.00010	9/21/2015	0.00010	0.0002	E505	2010	40170
Methoxychlor	< 0.00200	9/21/2015	0.00200	0.04	E505	2015	40170
Oxamyl	< 0.020	9/21/2015	0.020	0.2	E531.2	2036	40170
Total Polychlorinated Biphenyls	< 0.00025	9/21/2015	0.00025	0.0005	E505	2383	40170
Pentachlorophenol	< 0.0001	9/30/2015	0.0001	0.001	E515.2	2326	40170
Picloram	< 0.0020	9/30/2015	0.0020	0.5	E515.2	2040	40170
Simazine	< 0.0020	9/29/2015	0.0020	0.004	E525.2	2037	40170
Toxaphene	< 0.00100	9/21/2015	0.00100	0.003	E505	2020	40170

3-Hydroxycarbofuran	< 0.020	9/21/2015	0.020		E531.2	2066	40170
Aldicarb	< 0.020	9/21/2015	0.020		E531.2	2047	40170
Aldicarb sulfone	< 0.020	9/21/2015	0.020		E531.2	2044	40170
Aldicarb sulfoxide	< 0.020	9/21/2015	0.020		E531.2	2043	40170
Aldrin	< 0.00100	9/21/2015	0.00100		E505	2356	40170
Butachlor	< 0.01000	9/21/2015	0.01000		E505	2076	40170
Carbaryl	< 0.020	9/21/2015	0.020		E531.2	2021	40170
Dicamba	< 0.0020	9/30/2015	0.0020		E515.2	2440	40170
Dieldrin	< 0.00100	9/21/2015	0.00100		E505	2070	40170
Methomyl	< 0.020	9/21/2015	0.020		E531.2	2022	40170
Metolachlor	< 0.01000	9/21/2015	0.01000		E505	2045	40170
Metr buzin	< 0.00200	9/21/2015	0.00200		E505	2595	40170
Propachlor	< 0.00200	9/21/2015	0.00200		E505	2077	40170

The samples were analyzed in general accordance with methods outlined in Methods for the Determination of Organic Compounds in Drinking Water, EMSL-Cincinnati, EPA/600/4-88/039 and EPA/600/4-90/020.

Laboratory: TTL, Inc.
System: Uniontown Utilities Board
Source: Well 2 - Finished
Date Collected: 9/18/2015
TTL Lab Number: 150918061-002

Labid: 40170
Pwsid: 0001100
Sourceid:
Sample Type (D/R):

Contaminant	Results, mg/L	Date Analyzed	MDL, mg/L	MCL, mg/L	Method	Code	Labid
2,4,5-TP (Silvex)	< 0.0001	9/30/2015	0.0001	0.05	E515.2	2110	40170
2,4-D	< 0.0010	9/30/2015	0.0010	0.07	E515.2	2105	40170
Alachlor	< 0.0010	9/29/2015	0.0010	0.002	E525.2	2051	40170
Atrazine	< 0.0010	9/29/2015	0.0010	0.003	E525.2	2050	40170
Benzo(a)pyrene	< 0.0001	9/29/2015	0.0001	0.0002	E525.2	2306	40170
Carbofuran	< 0.020	9/21/2015	0.020	0.04	E531.2	2046	40170
Chlordane	< 0.00100	9/24/2015	0.00100	0.002	E505	2959	40170
Dalapon	< 0.00200	9/25/2015	0.00200	0.2	E552.2	2031	40170
1,2-Dibromo-3-chloropropane	< 0.00001	9/29/2015	0.00001	0.0002	E504.1	2931	40170
bis(2-Ethylhexyl)adipate	< 0.0020	9/29/2015	0.0020	0.4	E525.2	2035	40170
Bis(2-ethylhexyl)phthalate	< 0.0020	9/29/2015	0.0020	0.006	E525.2	2039	40170
Dinoseb	< 0.0020	9/30/2015	0.0020	0.007	E515.2	2041	40170
Diquat	< 0.01	9/29/2015	0.01	0.02	E549.2	2932	40170
1,2-Dibromoethane	< 0.00001	9/29/2015	0.00001	0.00005	E504.1	2946	40170
Endothall	< 0.05	9/24/2015	0.05	0.1	E548.1	2033	40170
Endrin	< 0.00020	9/24/2015	0.00020	0.002	E505	2005	40170
Glyphosate	< 0.25	9/28/2015	0.25	0.7	E547	2034	40170
Heptachlor	< 0.00010	9/24/2015	0.00010	0.0004	E505	2065	40170
Heptachlor epoxide	< 0.00010	9/24/2015	0.00010	0.0002	E505	2067	40170
Hexachlorobenzene	< 0.00050	9/24/2015	0.00050	0.001	E505	2274	40170
Hexachlorocyclopentadiene	< 0.01000	9/24/2015	0.01000	0.05	E505	2042	40170
gamma-BHC	< 0.00010	9/24/2015	0.00010	0.0002	E505	2010	40170
Methoxychlor	< 0.00200	9/24/2015	0.00200	0.04	E505	2015	40170
Oxamyl	< 0.020	9/21/2015	0.020	0.2	E531.2	2036	40170
Total Polychlorinated Biphenyls	< 0.00025	9/24/2015	0.00025	0.0005	E505	2383	40170
Pentachlorophenol	< 0.0001	9/30/2015	0.0001	0.001	E515.2	2326	40170
Picloram	< 0.0020	9/30/2015	0.0020	0.5	E515.2	2040	40170
Simazine	< 0.0020	9/29/2015	0.0020	0.004	E525.2	2037	40170
Toxaphene	< 0.00100	9/24/2015	0.00100	0.003	E505	2020	40170

3-Hydroxycarbofuran	< 0.020	9/21/2015	0.020	E531.2	2066	40170
Aldicarb	< 0.020	9/21/2015	0.020	E531.2	2047	40170
Aldicarb sulfone	< 0.020	9/21/2015	0.020	E531.2	2044	40170
Aldicarb sulfoxide	< 0.020	9/21/2015	0.020	E531.2	2043	40170
Aldrin	< 0.00100	9/24/2015	0.00100	E505	2356	40170
Butachlor	< 0.01000	9/24/2015	0.01000	E505	2076	40170
Carbaryl	< 0.020	9/21/2015	0.020	E531.2	2021	40170
Dicamba	< 0.0020	9/30/2015	0.0020	E515.2	2440	40170
Dieldrin	< 0.00100	9/24/2015	0.00100	E505	2070	40170
Methomyl	< 0.020	9/21/2015	0.020	E531.2	2022	40170
Metolachlor	< 0.01000	9/24/2015	0.01000	E505	2045	40170
Metr buzin	< 0.00200	9/24/2015	0.00200	E505	2595	40170
Propachlor	< 0.00200	9/24/2015	0.00200	E505	2077	40170

The samples were analyzed in general accordance with methods outlined in Methods for the Determination of Organic Compounds in Drinking Water, EMSL-Cincinnati, EPA/600/4-88/039 and EPA/600/4-90/020.

Laboratory: TTL, Inc.
System: Uniontown Utilities Board
Source: Trip Blank
Date Collected: 9/18/2015
TTL Lab Number: 150918061-003

Labid: 40170
Pwsid: 0001100
Sourceid:
Sample
Type (D/R):

Contaminant	Results, mg/L	Date Analyzed	MDL, mg/L	MCL, mg/L	Method	Code	Labid
Glyphosate	< 0.25	9/28/2015	0.25	0.7	E547	2034	40170

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**ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
NOTICE OF PROPOSED RENEWAL AND MODIFICATION OF A MUNICIPAL SOLID WASTE LANDFILL
PERMIT UNDER THE ALABAMA SOLID WASTES AND RECYCLABLE MATERIALS MANAGEMENT ACT AND
REQUEST FOR COMMENTS
PUBLIC NOTICE – 422**

Perry County

Perry County Associates, LLC, has applied to renew and modify the permit to operate a municipal solid waste landfill known as the **Arrowhead Landfill (Permit 53-03)**. The modification raises the base grade elevations for the composite liner system at the Arrowhead Landfill resulting in a reduction of landfill airspace. The modification also requests changes to the groundwater monitoring plan regarding the installation schedule of groundwater monitoring wells around Tracts 2 and 3, and adds the following parameters to be sampled during semi-annual groundwater monitoring events: boron, calcium, chloride, fluoride, sulfate, total dissolved solids (TDS). Finally, the modification requests updates to the closure plan; post-closure plan; Construction Quality Assurance (CQA) plan; Technical Specifications; Storm Water ,Erosion, and Sediment Control Design Calculations; and prohibited waste exclusion plan. The waste stream for the Arrowhead Landfill would remain nonhazardous solid wastes, noninfectious putrescible and nonputrescible wastes including but not limited to household garbage, commercial waste, industrial waste, construction and demolition debris, other similar type materials, and special waste approved by ADEM. The service area for the Arrowhead Landfill would remain the States of Alabama, Arkansas, Connecticut, Delaware, Florida, Georgia, Illinois, Indiana, Iowa, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, New Hampshire, New Jersey, New York, North Carolina, Ohio, Oklahoma, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Vermont, Virginia, West Virginia, and Wisconsin. The maximum average daily volume of waste disposed at the Arrowhead Landfill would remain 15,000 tons per day. All previously approved variances and special conditions would be granted in the renewed permit.

The landfill is located in Sections 21, 22, 27, and 28, Township 17 North, Range 6 East in Perry County, Alabama. The permitted facility consists of 973.85 acres with 425.33 acres permitted for disposal operations.

Copies of the public notice and proposed permit are available for public inspection electronically via the ADEM web site at <http://adem.alabama.gov/newsEvents/pubHearings.cnt>, and the complete application at the following locations Monday – Friday (except legal holidays), 8:00 am to 5:00 pm. A nominal fee for copying and/or mailing may be charged. Arrangements for copying should be made in advance.

**Russell A. Kelly, Chief
Permits and Services Division
ADEM
1400 Coliseum Blvd.
[Mailing address: PO Box 301463; Zip 36130-1463]
Montgomery, Alabama 36109-2608
(334) 271-7714**

and

**Uniontown Public Library
108 Water Avenue
Uniontown, Alabama 36786**

The Department has scheduled a public meeting to allow for a question and answer session between interested citizens and ADEM officials. The meeting will be held on September 29, 2016, in the auditorium of the Uniontown Municipal Building located at 100 Front Street, Uniontown, Alabama at 6:00 PM.

Persons wishing to comment may do so, in writing, to the Department's named contact above by 5:00 PM on October 13, 2016, which was extended from the original comment period end date of September 13, 2016. In order to affect final decisions, comments must offer technically substantial information that is applicable to the proposed permit.

After consideration of all written comments, review of any public hearing record, and consideration of the requirements of the Alabama Solid Wastes and Recyclable Materials Management Act, and applicable regulations, the Department will make a final determination. The Department will develop a response to comments, which will become part of the public record and will be available to persons upon request. Notice will be sent to any person requesting notice of the final action.

The Department maintains a list of interested individuals who are mailed legal notices regarding proposed permits. If you wish to receive such notices, contact the Permits & Services Division via telephone (334-271-7714), US Mail (P.O. Box 301463, Montgomery, AL 36130-1463), or e-mail (permitsmail@adem.alabama.gov).

Any person wishing to participate in this hearing who needs special accommodations should contact the Department's Permits & Services Division at (334) 271-7714 at least five working days prior to the hearing.

This notice is hereby given this **7th day of September, 2016**, by authorization of the Alabama Department of Environmental Management.



Lance R. LeFleur
Director

Nondiscrimination Statement: The Department does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in the administration of its programs.

LANCE R. LEFLEUR
DIRECTOR



ROBERT J. BENTLEY
GOVERNOR

Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

August 30, 2016

LEGAL AD DEPARTMENT
Selma Times

***NOTE: Starting immediately, only
ONE (1) copy of the invoice and
tearsheet are required. We will no
longer pay for extra copies.***

To Whom It May Concern:

It is requested that the attached public notice be published in your newspaper (one time) on **September 7, 2016**. ALL NOTICES ARE TO BE RUN AS STANDARD LEGAL NOTICES, NOT DISPLAY. If a display ad is needed, please call Ragan Harrison, Permits & Services, (334) 271-7714.

INVOICE/TEAR SHEET INFO: Upon completion of advertising this public notice, please submit ONE COPY of your invoice and proof of publication. The invoice must include the rate, quantity, and total amount. This submission should be mailed to: ATTN: BEVERLY MILLER, Fiscal Branch, P. O. Box 301463, Montgomery, AL 36130-1463 or emailed to bjmiller@adem.state.al.us. Authorization of payment of public notices cannot be made by our office unless the above documents are received. Inquiries about payment of invoices should be directed to ADEM Fiscal Branch, (334) 270-5654.

If further information is needed concerning this matter, please let us know.

Sincerely,

Ragan Harrison
Permit & Services Division

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Branch
2715 Sandlin Road, S.W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (FAX)



Mobile Branch
2204 Perimeter Road
Mobile, AL 36615-1131
(251) 450-3400
(251) 479-2593 (FAX)

Mobile-Coastal
3664 Dauphin Street, Suite B
Mobile, AL 36608
(251) 304-1176
(251) 304-1189 (FAX)

LANCE R. LEFLEUR
DIRECTOR



ROBERT J. BENTLEY
GOVERNOR

Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

August 30, 2016

LEGAL AD DEPARTMENT
Marion Times

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1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

August 30, 2016

LEGAL AD DEPARTMENT
Demopolis Times

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Dr



HODGES, HARBIN,
NEWBERRY & TRIBBLE, INC.

Consulting Engineers

H. LOWRY TRIBBLE, JR., P.E.
WILLIAM F. HODGES, P.E.
W. MICHAEL STUBBS, P.E.
R. BRANT LANE, P.E.
CLINT L. COURSON, CHMM
K. MATTHEW CHEEK, P.E.
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ERIC P. JACKSON, P.E.
DAVID E. BATTSON, P.E.
RYAN S. PETERS, P.E.
WILLIAM M. REESE, P.E.

January 4, 2016

Ms. Lee Warren
Alabama Department of Environmental Management
Industrial Section / Water Division
P.O. Box 301463
Montgomery, AL 36130-1463

**Re: Arrowhead Landfill
Storm Water Drainage Improvement Plan
NPDES Permit No. ALG160167
HHNT Project No. 3006-029-13**

Dear Ms. Warren:

In response to recent citizen complaints and on behalf of Arrowhead Landfill, we have enclosed a plan sheet depicting planned storm water improvements on the southeastern portion of the property. The improvements include reversing the grade of the existing drainage ditch that runs along the corner of Cell 3 and discharges toward Cahaba Road. Instead of storm water runoff flowing south toward Cahaba Road and across the road to a tributary of Chilatchee Creek, the ditch will flow north to existing Sediment Pond No. 1. Discharges from Sediment Pond No. 1 will leave the site through the permitted Outfall No. 1 (DSN001-01, DSN003-02). Construction activities are planned for the first quarter of 2016 (weather permitting) and ADEM will be notified prior to construction initiation.

It is our understanding that these improvements will not require coverage under the NPDES Construction General Permit ALR100000 since the disturbed area will be less than one acre and not part of a common plan for development. It is also our understanding that these improvements will not require additional sampling (upstream/downstream turbidity, etc.) since the construction does not meet the definition of land disturbing activities described in the NPDES Industrial General Permit (i.e. the construction is not associated with opening and closing landfill cells or digging for cover).

It should be reiterated that the storm water runoff that has been leaving the facility property at Cahaba Road does not contain storm water runoff from areas of industrial activity and is therefore not regulated by the facility's NPDES Industrial General Permit. These improvements are not required, but are an effort to demonstrate Arrowhead Landfill's continued effort to being a good steward in the community.

Should you have any questions, please call.



Ms. Lee Warren

January 4, 2016

Page 2 of 2

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Sincerely,

HODGES, HARBIN, NEWBERRY & TRIBBLE, INC.

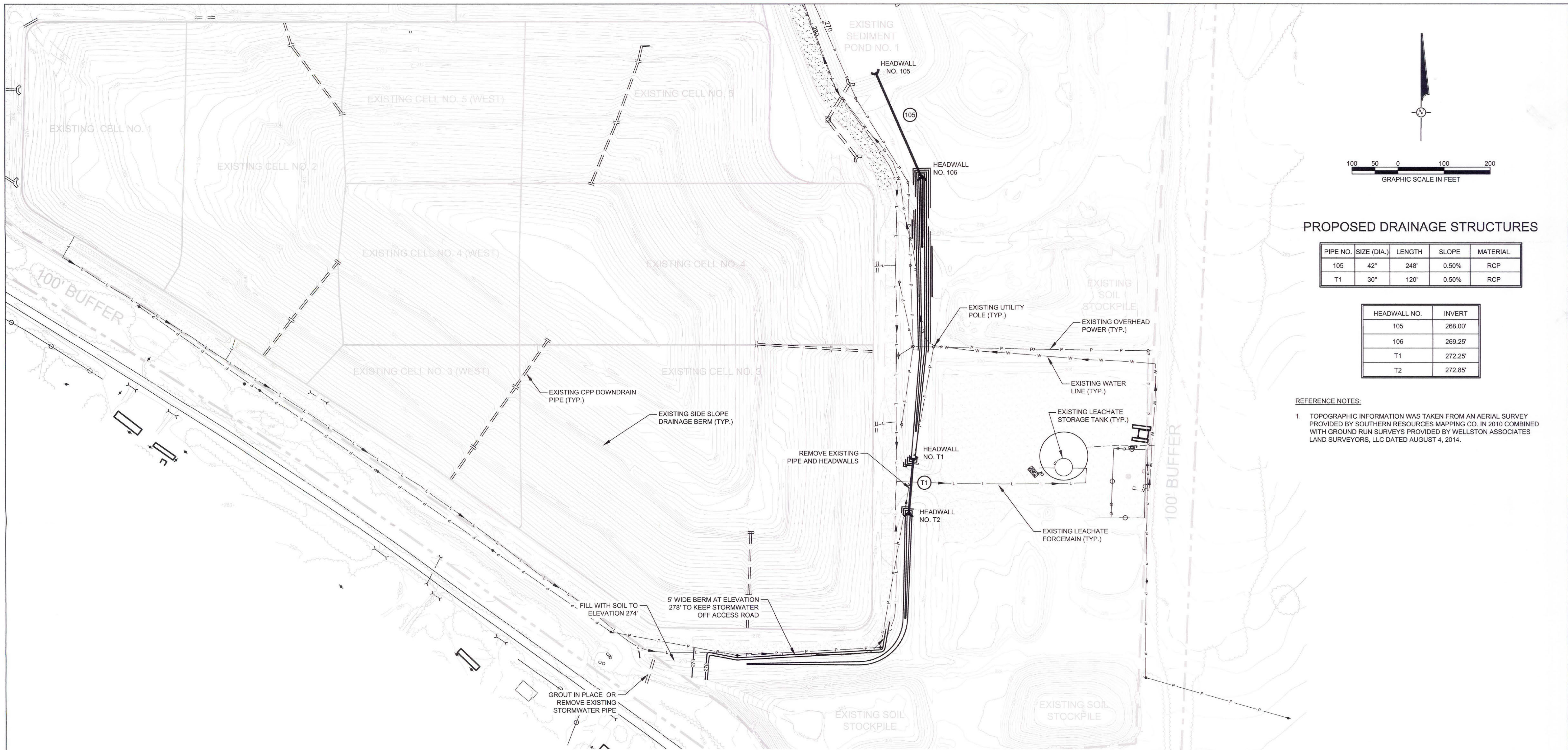
A handwritten signature in blue ink, appearing to read 'W. F. Hodges', with a long horizontal flourish extending to the right.

William F. Hodges, P.E.
Professional Engineer

WFH/tw

Enclosure

cc: Scott Story (w/ enclosure)
Brent Watson (w/ enclosure)
Dodi Moseley (w/ enclosure)
Evan Roberts (w/ enclosure)
Ernest Kaufmann (w/ enclosure)
Oscar Allen (w/ enclosure)
Thad Owings (w/ enclosure)
Joy Hammonds (w/ enclosure)
Johnny Sikes (w/ enclosure)



PROPOSED DRAINAGE STRUCTURES

PIPE NO.	SIZE (DIA.)	LENGTH	SLOPE	MATERIAL
105	42"	248'	0.50%	RCP
T1	30"	120'	0.50%	RCP

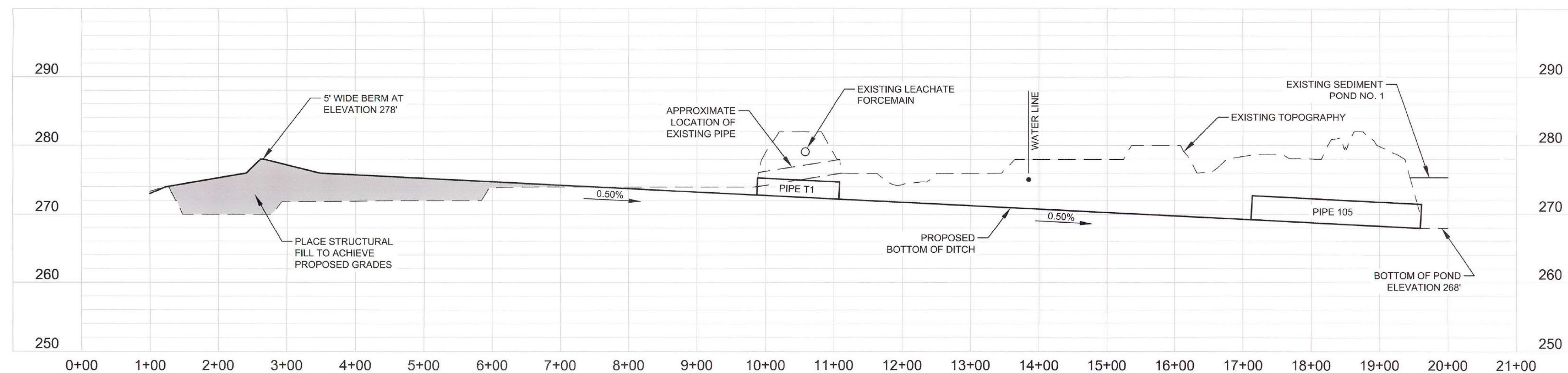
HEADWALL NO.	INVERT
105	268.00'
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T1	272.25'
T2	272.85'

REFERENCE NOTES:

- TOPOGRAPHIC INFORMATION WAS TAKEN FROM AN AERIAL SURVEY PROVIDED BY SOUTHERN RESOURCES MAPPING CO. IN 2010 COMBINED WITH GROUND RUN SURVEYS PROVIDED BY WELLSTON ASSOCIATES LAND SURVEYORS, LLC DATED AUGUST 4, 2014.

PROPOSED DITCH PROFILE

VERTICAL: 1" = 10' , HORIZONTAL: 1" = 100'



Preliminary

PLAN AND PROFILE OF STORMWATER IMPROVEMENTS			
2016 STORMWATER IMPROVEMENTS			
ARROWHEAD LANDFILL			
FOR			
HOWLING COYOTE, LLC			
PERRY COUNTY ASSOCIATES, LLC			
PERRY COUNTY, ALABAMA			
HHNT			
HODGES, HARBIN, NEWBERRY & TRIBBLE, INC.			
Consulting Engineers			
(478) 743-7175 (478) 743-1703 FAX		3920 ARKWRIGHT RD. SUITE 101 MACON, GEORGIA 31210	
PROJ. NO.	3006-029-01	DWG.	AH-2016 SW
SCALE	1" = 100'	EDIT	12-18-15
DATE	DECEMBER 2015	SHEET	1 OF 1

Dr



HODGES, HARBIN,
NEWBERRY & TRIBBLE, INC.

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WILLIAM M. REESE, P.E.

January 4, 2016

Ms. Lee Warren
Alabama Department of Environmental Management
Industrial Section / Water Division
P.O. Box 301463
Montgomery, AL 36130-1463

**Re: Arrowhead Landfill
Storm Water Drainage Improvement Plan
NPDES Permit No. ALG160167
HHNT Project No. 3006-029-13**

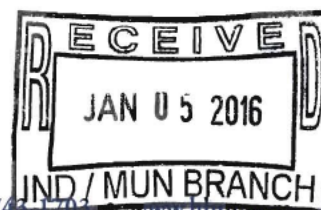
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Ms. Lee Warren

January 4, 2016

Page 2 of 2

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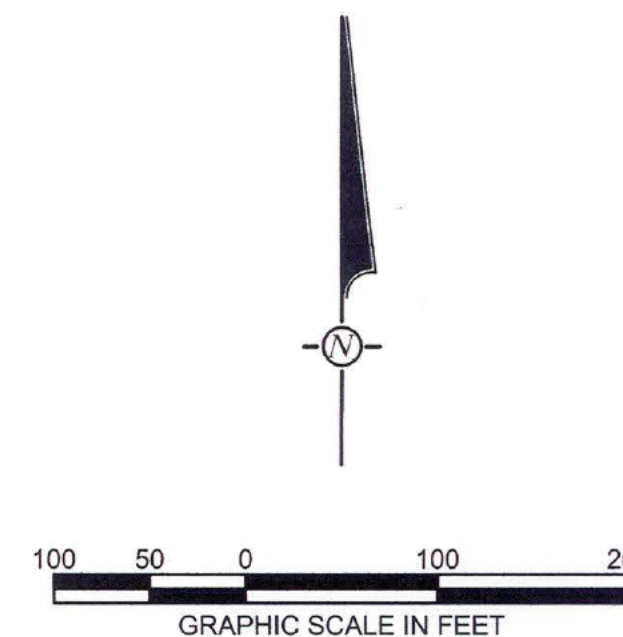
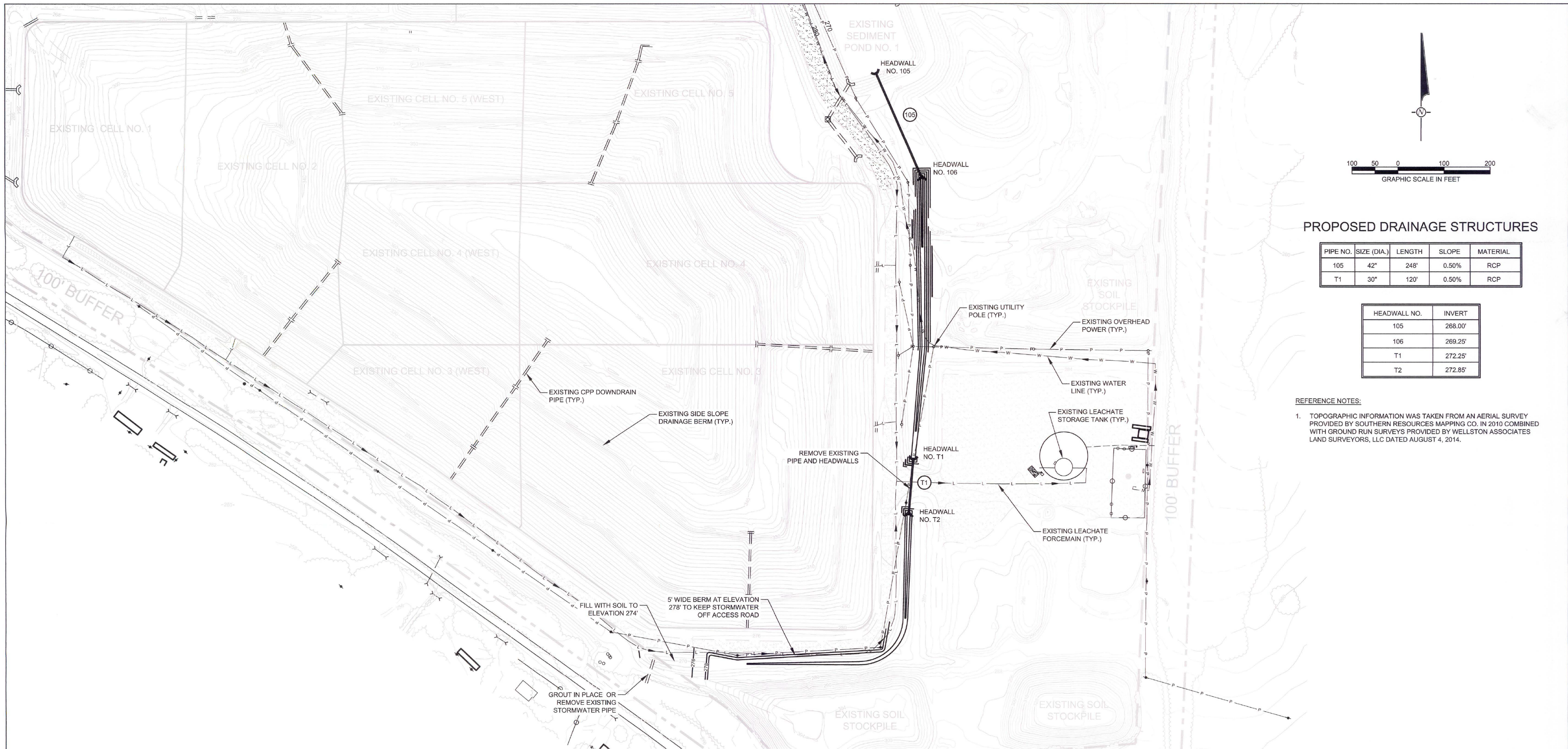
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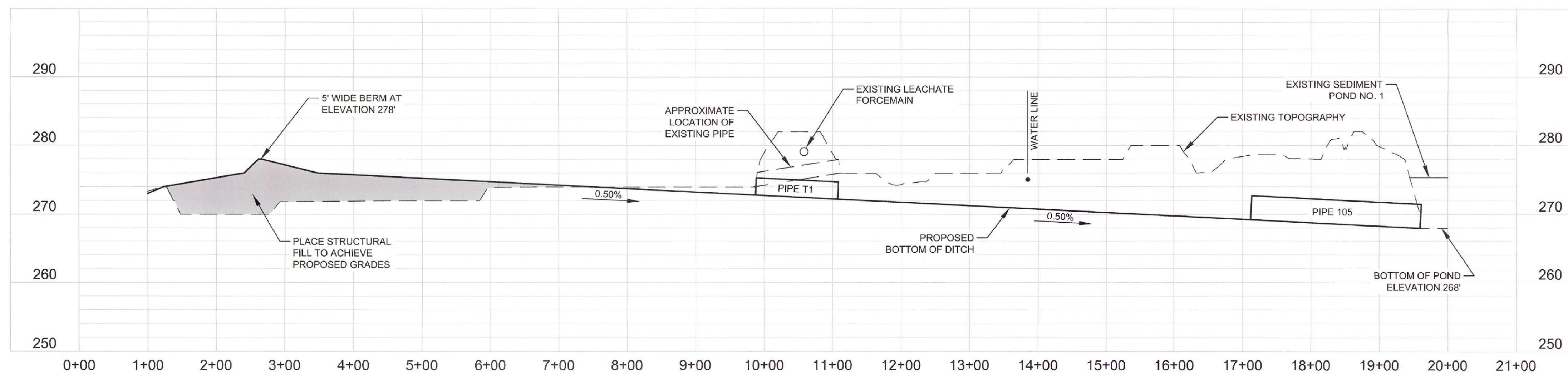
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SCALE	1" = 100'	EDIT	12-18-15
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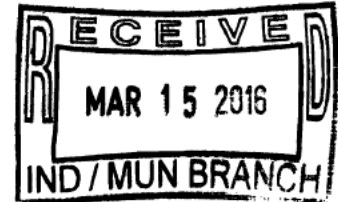
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HHNT
— HODGES, HARBIN, —
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RYAN S. PETERS, P.E.
WILLIAM M. REESE, P.E.

March 14, 2016

Ms. Lee Warren
Alabama Department of Environmental Management
Industrial Section / Water Division
P.O. Box 301463
Montgomery, AL 36130-1463



**Re: Arrowhead Landfill
Notification of Construction Project Commencement – Storm Water Ditch Re-grading
NPDES Permit No. ALG160167
HHNT Project No. 3006-029-13**

Dear Ms. Warren:

This letter serves to notify your Section that the storm water ditch re-grading project started at Arrowhead Landfill today. This construction project was described in a letter to you on January 4, 2016 with a construction plan sheet attached showing planned storm water drainage improvements (re-attached to this letter for reference). We will notify your office upon project completion.

Should you have any questions, please call.

Sincerely,

HODGES, HARBIN, NEWBERRY & TRIBBLE, INC.

A handwritten signature in cursive script, appearing to read "W F Hodges".

William F. Hodges, P.E.
Professional Engineer

WFH/tw

Enclosure

cc: Dodi Moseley (w/ enclosure)
Evan Roberts (w/ enclosure)
Brent Watson (w/ enclosure)
Shane Lovett (w/ enclosure)
Scott Story (w/ enclosure)
Jana Riley (w/ enclosure)

Ernest Kaufman (w/ enclosure)
Oscar Allen (w/ enclosure)
Thad Owings (w/ enclosure)
Joy Hammonds (w/ enclosure)
Johnny Sikes (w/ enclosure)

H. LOWRY TRIBBLE, JR., P.E.
WILLIAM F. HODGES, P.E.
W. MICHAEL STUBBS, P.E.
R. BRANT LANE, P.E.
CLINT L. COURSON, CHMM
K. MATTHEW CHEEK, P.E.
DANIEL E. CHEEK, P.E.
KEVIN G. BERRY, P.E.

HHNT
— HODGES, HARBIN, —
NEWBERRY & TRIBBLE, INC.

Consulting Engineers

NATHAN D. DUNN, P.E.
RYAN S. WILLOUGHBY, P.E.
WILLIAM A. GRANICH, P.E.
ROBERT D. HELLER, CHMM
ERIC P. JACKSON, P.E.
DAVID E. BATTSON, P.E.
RYAN S. PETERS, P.E.
WILLIAM M. REESE, P.E.

January 4, 2016

Ms. Lee Warren
Alabama Department of Environmental Management
Industrial Section / Water Division
P.O. Box 301463
Montgomery, AL 36130-1463

**Re: Arrowhead Landfill
Storm Water Drainage Improvement Plan
NPDES Permit No. ALG160167
HHNT Project No. 3006-029-13**



Dear Ms. Warren:

In response to recent citizen complaints and on behalf of Arrowhead Landfill, we have enclosed a plan sheet depicting planned storm water improvements on the southeastern portion of the property. The improvements include reversing the grade of the existing drainage ditch that runs along the corner of Cell 3 and discharges toward Cahaba Road. Instead of storm water runoff flowing south toward Cahaba Road and across the road to a tributary of Chilatchee Creek, the ditch will flow north to existing Sediment Pond No. 1. Discharges from Sediment Pond No. 1 will leave the site through the permitted Outfall No. 1 (DSN001-01, DSN003-02). Construction activities are planned for the first quarter of 2016 (weather permitting) and ADEM will be notified prior to construction initiation.

It is our understanding that these improvements will not require coverage under the NPDES Construction General Permit ALR100000 since the disturbed area will be less than one acre and not part of a common plan for development. It is also our understanding that these improvements will not require additional sampling (upstream/downstream turbidity, etc.) since the construction does not meet the definition of land disturbing activities described in the NPDES Industrial General Permit (i.e. the construction is not associated with opening and closing landfill cells or digging for cover).

It should be reiterated that the storm water runoff that has been leaving the facility property at Cahaba Road does not contain storm water runoff from areas of industrial activity and is therefore not regulated by the facility's NPDES Industrial General Permit. These improvements are not required, but are an effort to demonstrate Arrowhead Landfill's continued effort to being a good steward in the community.

Should you have any questions, please call.

Ms. Lee Warren
January 4, 2016
Page 2 of 2

Sincerely,

HODGES, HARBIN, NEWBERRY & TRIBBLE, INC.

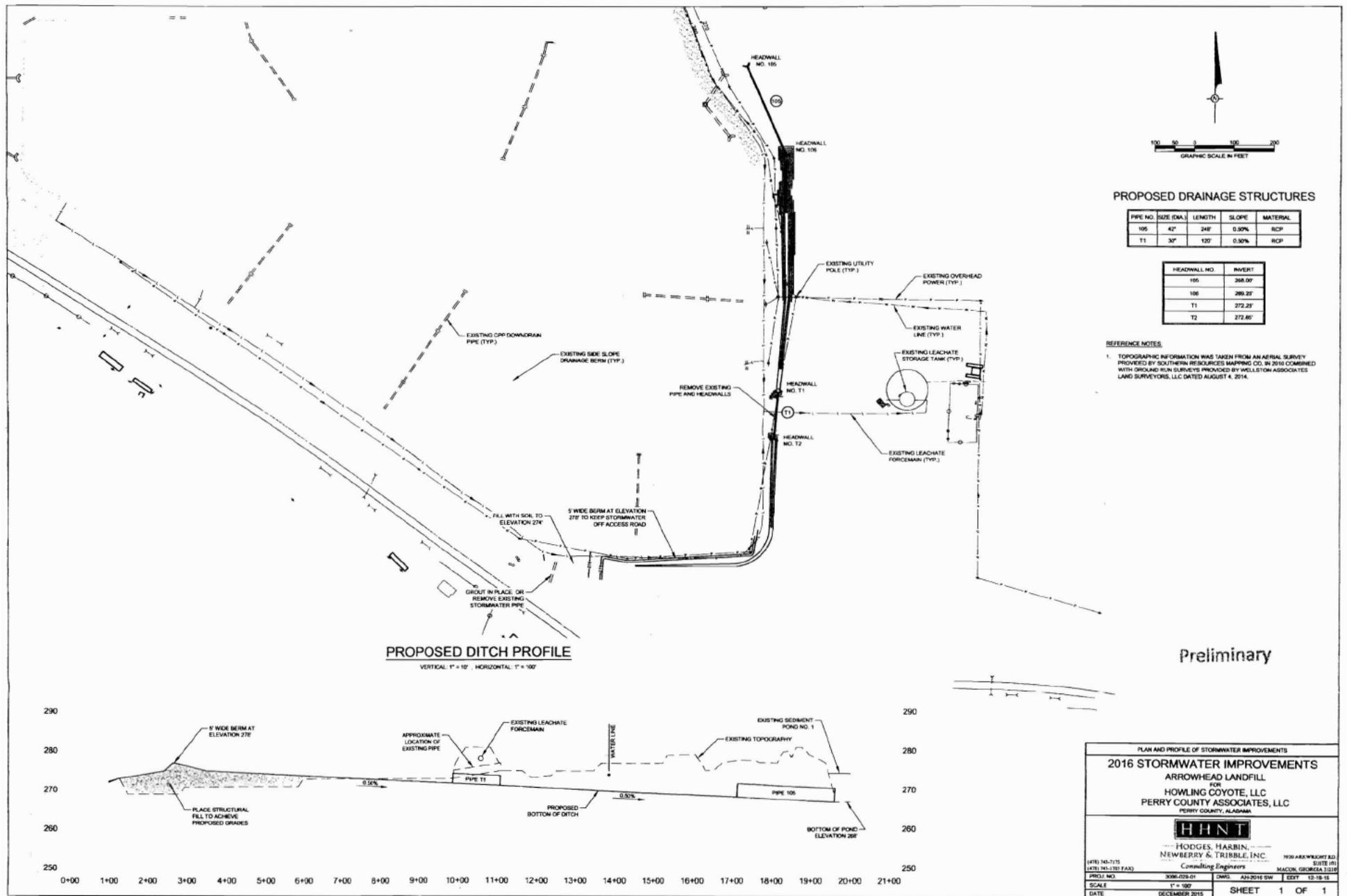


William F. Hodges, P.E.
Professional Engineer

WFH/tw

Enclosure

cc: Scott Story (w/ enclosure)
Brent Watson (w/ enclosure)
Dodi Moseley (w/ enclosure)
Evan Roberts (w/ enclosure)
Ernest Kaufmann (w/ enclosure)
Oscar Allen (w/ enclosure)
Thad Owings (w/ enclosure)
Joy Hammonds (w/ enclosure)
Johnny Sikes (w/ enclosure)



LANCE R. LEFLEUR
DIRECTOR



ROBERT J. BENTLEY
GOVERNOR

Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

April 20, 2015

Ernest Kaufmann
Perry County Associates, LLC
622 Tayloe Road
Uniontown AL 36786

RE: Facility Inspection
Arrowhead Landfill
NPDES Permit # ALG160167
FID 35125.7
Perry County (105)
Inspected 4/17/2015

Dear Mr. Kaufman:

Enclosed is a copy of an inspection report for the above referenced facility. A copy of the inspection report has been transmitted to the Department's Water Division for a compliance determination and any follow-up as appropriate.

Should you have any questions regarding permitting, compliance, enforcement, or any follow-up action you should take to address any deficiencies noted, please contact your ADEM permit staff contact or the Water Division in Montgomery at H2Omail@adem.state.al.us or by phone at (334) 271-7799.

Should you have any questions regarding observations noted during the inspection, please contact me by email at elroberts@adem.state.al.us or by phone at (205) 942-6168.

Sincerely,

Evan Roberts
Birmingham Branch
Field Operations Division

File: INSPR/17668
ecopy: Water Division
Enclosure: Inspection Report

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Branch
2715 Sandlin Road, S. W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (FAX)



Mobile Branch
2204 Perimeter Road
Mobile, AL 36615-1131
(251) 450-3400
(251) 479-2593 (FAX)

Mobile-Coastal
4171 Commanders Drive
Mobile, AL 36615-1421
(251) 432-6533
(251) 432-6598 (FAX)



Alabama Department of Environmental Management
NPDES INSPECTION REPORT

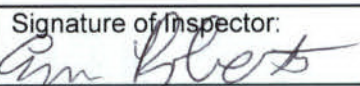
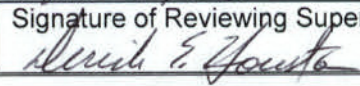
Company/Operator/Permittee: Perry County Associates, LLC		FID 35125.7	Phone Number: (770)720-2717	
Mailing Address: 622 Tayloe Road		City Uniontown	State AL	Zip Code 36786
Responsible Official/Operator Name: Ernest Kaufmann				

Facility Name: Arrowhead Landfill	NPDES Permit #: ALG160167	Permit Effect Date: 02/01/2012	Inspection Entry Date & Time: 4/17/2015 11:10 AM	County: Perry
Activity Description Landfill	NMS Inspection #: 48836	Permit Expire Date: 01/31/2017	Inspection Exit Date & Time: 4/17/2015 2:59 PM	Report Complete Date: 4/20/2015
Inspection Type: (X) CEI () CSI () PAI Routine () Complaint (X) Photos Taken (X) Samples Collected (X)				

Township, Range, Section: T17N, R6E, S28
Physical Address/Location Description (include nearest city): County Road 1, near Perry, AL

Entrance Latitude & Longitude: 32.413512, -87.473396
Discharge Point(s) Latitude & Longitude: 32.41486, -87.465887, 32.41481, -87.47281; 32.41019, -87.46792
Receiving Water(s): UT Tayloe Creek, UT Chilatchee Creek
Weather Conditions: Intermittent rain, warm

Summary: Disturbed areas that were not currently in use had not been vegetated or otherwise stabilized. Stormwater from disturbed area was observed entering drainage ditch north and downgradient of sampling point for DSN 001-2. Turbid stormwater observed leaving landfill property near southeast corner of facility, at latitude 32.41019, longitude -87.46792, was not a permitted outfall. This stormwater drained from an unused storage field that was not stabilized, but not from landfill cells. Turbidity of the stormwater discharge alongside County Road 21 was 118 NTUs. Turbidity of the unnamed tributary of Chilatchee Creek upstream of the discharge was 34.5 NTUs. Turbidity of the unnamed tributary of Chilatchee Creek downstream of the discharge was 55.7 NTUs, a difference of 21.2 NTUs.

Name(s) of On-site Representative(s) and Phone Numbers: Thad Owings, (770)7250-2717		
Name of Inspector: Evan Roberts	Signature of Inspector: 	Date: 4/20/2015
Name of Reviewing Supervisor: Derick Houston	Signature of Reviewing Supervisor: 	Date: 4/20/2015

FOD Office: Birmingham

NPDES INDUSTRIAL STORMWATER INSPECTION REPORT

FACILITY NAME: Arrowhead Landfill		PERMIT NUMBER: ALG160167		
I. RECORDS				
A. Copy of Permit Available	N/A	X YES	NO	Comment #
B. Discharge Monitoring Reports (DMRs) Available	N/A	X YES	NO	Comment #
DMRs Retained for 3 Years	N/A	X YES	NO	Comment #
C. Laboratory Records Available	N/A	X YES	NO	Comment #
Laboratory Records Retained for 3 Years	N/A	X YES	NO	Comment #
D. Commercial Lab Used for Reported Analyses	N/A	X YES	NO	Comment #
Name: Analytical Services, Inc.	Location: Norcross, GA			
E. Adequate Records Maintained of::				
1. Sample Date, Time and Location	N/A	X YES	NO	Comment #
2. Analyses Date and Time	N/A	X YES	NO	Comment #
3. Analytical Methods	N/A	X YES	NO	Comment #
4. Standard Methods/EPA Approved Analytical Method	N/A	X YES	NO	Comment #
5. Analyst	N/A	X YES	NO	Comment #
6. Lab Equipment Calibration and Maintenance	N/A	X YES	NO	Comment #
7. Rainfall Data	N/A	X YES	NO	Comment #
F. Correct Name and Mailing Address of Permittee	N/A	X YES	NO	Comment #
II. POLLUTION PREVENTION PRACTICES/PLANS				
A. Best Management Practices (BMP) Plan Available	N/A	X YES	NO	Comment #
Last Update to BMP Plan: January 2015				
B. BMP Measures Appear Adequate, If no provide	N/A	YES	X NO	Comment # 1
C. BMP Training Records Available	N/A	X YES	NO	Comment #
D. BMP Inspection Records Available	N/A	X YES	NO	Comment #
Inspection Records Retained for 3 Years	N/A	X YES	NO	Comment #
E. Spill Prevention Control and Countermeasures (SPCC) Plan Available	N/A	X YES	NO	Comment # 2
Last Update to SPCC: January 2015				
List Tanks and Capacities in Comment Section				
F. Pollution Prevention (P2)/Source Reduction Plan and/or P2 Practices	N/A	X YES	NO	Comment #
G. All Discharges Appear to be properly Permitted	N/A	YES	X NO	Comment # 3
H. Adequate Containment for Products/Byproducts and Waste Materials	N/A	X YES	NO	Comment #
III. MONITORING INFORMATION				
A. Flow Measurement				
Method of measurement on Non-Stormwater Outfalls: Instantaneous Weir Other				
B. Sampling				
1. Location(s) Adequate	N/A	YES	X NO	Comment # 4
2. Sample Type(s) Agree with Permit	N/A	X YES	NO	Comment #
3. Preservation Techniques Agree with 40 CFR 136	N/A	X YES	NO	Comment #
4. Sample Holding Times Agree with EPA Guidance	N/A	X YES	NO	Comment #
5. Monitoring and Analyses Performed More Frequently Than Required	N/A	YES	X NO	Comment #
6. If Yes to 5, Results are Reported in Permittee's Self Monitoring Report	X N/A	YES	NO	Comment #
7. Stormwater Samples Collected in Accordance with Permit Requirements	N/A	X YES	NO	Comment #

N/A – Not Applicable

NPDES INDUSTRIAL STORMWATER INSPECTION REPORT

IV. EFFLUENT/RECEIVING WATER VISUAL OBSERVATIONS

Outfall(s) have Oil Sheen	YES	X NO	Comment #
Outfall(s) have Visible Foam	YES	X NO	Comment #
Outfall(s) have Visible Floating Solids	YES	X NO	Comment #

V. COMMENTS

Comment No.	Comment	Photograph No.
1	Disturbed areas that were not currently in use had not been vegetated or otherwise stabilized.	3, 14-16
2	No fuel or chemical storage. Leachate tank was within secondary containment.	17-18
3	Turbid stormwater observed leaving landfill property near southeast corner of facility, at latitude 32.41019, longitude -87.46792, was not a permitted outfall. This stormwater drained from an unused storage field that was not stabilized, but not from landfill cells.	1-9
4	Stormwater from disturbed area was observed entering drainage ditch north and downgradient of sampling point for DSN 001-2.	11-16

VI. SAMPLE RESULTS

Turbidity of stormwater discharge alongside County Road 21 was 118 NTUs.

Turbidity of the unnamed tributary of Chilatchee Creek upstream of the discharge was 34.5 NTUs.

Turbidity of the unnamed tributary of Chilatchee Creek downstream of the discharge was 55.7 NTUs, a difference of 21.2 NTUs.

Perry County Associates, LLC
Arrowhead Landfill
ALG160167

Perry County
Evan Roberts
April 17, 2015

Roadside ditch. Stormwater ditch on landfill property, near southeast corner.



Turbidity at this point was 118 NTUs.

No temporary stabilization on area used for storage of concrete pipes.



Upgradient of previous photo.

3

Stormwater ditch downgradient of previous photo.



4

Stormwater ditch downgradient of previous photo.



5

Downgradient of previous photo.



6

Downgradient of previous photo and upgradient of first photo.



7

Drainage ditch downgradient of first photo.



Visible plume of turbid water in an unnamed tributary to Chilatchee Creek.
Turbidity upstream of this point was 34.5 NTUs.

8

Unnamed tributary to Chilatchee Creek downstream of previous.



Turbidity at this point was 55.7 NTUs, an increase of 21.2 NTUs.

9

Pond for DSN 001-2.



10

DSN 001-2 sampling point.



11

Ditch downgradient of previous photo. Turbid water observed here.



12

Ditch downgradient of previous photo.



13

Upgradient of drainage ditch in previous photos. No stabilization.



14

Upgradient of drainage ditch in previous photos. No stabilization.



15

Turbid water upgradient of drainage ditch.



16

Leachate tank with secondary containment.



17

Drain valve for secondary containment structure.



18

Pond for DSN 001-1.



19

DSN 001-1.



20

H. LOWRY TRIBBLE, JR., P.E.
WILLIAM F. HODGES, P.E.
W. MICHAEL STUBBS, P.E.
R. BRANT LANE, P.E.
CLINT L. COURSON, CHMM
K. MATTHEW CHEEK, P.E.
DANIEL E. CHEEK, P.E.
KEVIN G. BERRY, P.E.



NATHAN D. DUNN, P.E.
RYAN S. WILLOUGHBY, P.E.
WILLIAM A. GRANICH, P.E.
ROBERT D. HELLER, CHMM
ERIC P. JACKSON, P.E.
DAVID E. BATTSON, P.E.
RYAN S. PETERS, P.E.
WILLIAM M. REESE, P.E.

May 12, 2015

Mr. Evan Roberts
Birmingham Branch
Field Operations Division
110 Vulcan Road
Birmingham, Alabama 35209

**Re: Arrowhead Landfill
ADEM Facility Inspection Response Letter
NPDES Permit No. ALG160167
HHNT Project No. 3006-029-13**

Dear Mr. Roberts:

On behalf of Arrowhead Landfill, this letter is in response to your storm water inspection report dated April 20, 2015 corresponding to your site visit on April 17, 2015. It is our understanding that your inspection visit was conducted in response to citizen complaints received from Mr. Adam Johnston of the Alabama River Alliance received on April 8, 2015, as well as another complaint from Mr. William Gibson on April 15, 2015.

Arrowhead Landfill would like to respond to the comments on your inspection report, and to assure ADEM that the facility is dedicated to maintaining a high standard of environmental compliance. In order to provide a detailed response, we have listed each comment below in bold and the facility's responses and/or corrective actions in italics.

Inspection Comment #1: Disturbed areas that were not currently in use had not been vegetated or otherwise stabilized.

Response:

Arrowhead Landfill acknowledges that disturbed areas at the facility required grassing during the inspection on April 17, 2015. These areas had become bare after a long, wet and cold winter when grassing was difficult. We will forward under separate cover photographic documentation that the subject disturbed areas have been seeded and mulched in order to establish vegetation and stabilize the areas. These areas will continue to be inspected as part of the facility's bi-weekly routine operations in order to ensure a stand of vegetation is established and maintained. Should industrial activities be conducted

in one of these locations in the future, the outfall locations of DSN001-1 and DSN001-2 will be reevaluated.

Inspection Comment #2: No fuel or chemical storage. Leachate tank was within secondary containment.

Response: The facility's current Spill Pollution, Prevention, and Countermeasure Plan was last updated in January 2015. The attached page from the current plan lists the onsite petroleum storage tanks, which are all located on the mobile maintenance truck. The mobile maintenance truck is utilized throughout the facility for daily operations and is parked over the landfill liner at night or when not in use. The landfill liner serves as secondary containment and is sufficiently impervious to contain a spill, leak, or the entire contents of the mobile maintenance truck. This comment did not note any deficiencies and this response is provided for clarification purposes only.

Inspection Comment #3: Turbid storm water observed leaving landfill property near southeast corner of facility at latitude 32.41019, longitude -87.46792, was not a permitted outfall. This storm water drained from an unused storage field that was not stabilized, but not from landfill cells.

Response: Hodges, Harbin, Newberry & Tribble, Inc. has reviewed facility drainage patterns and has delineated the outfall drainage areas onsite. Additionally, the permit and state water quality rules were reviewed to assess the inspector's comment. Arrowhead Landfill is not of the opinion that the identified "unpermitted discharge" qualifies as a discharge, as defined in the NPDES General Permit (ALG160000). Discharges from specific industrial activities are authorized under this Permit; however, none of these activities are conducted in the unused storage area. Therefore, it is our opinion that permit coverage is not required for this area of the facility. We have reviewed the most recent topographic quadrangle published by the USGS dated 2014, and the nearest stream depicted on the quad map is located across Co. Rd. 1 (Cahaba Road) from the landfill.

Additionally, as noted in your inspection report, the turbidity monitoring results indicated a difference of 21.2 NTUs upstream and downstream of the subject runoff location. This upstream and downstream variance is in compliance with the permit limits (a parameter only required to be sampled during times of construction, which is not occurring). The Permit limits the downstream turbidity to less than or equal to 50 NTUs above the upstream turbidity of a sampling location during times of construction. Existing BMPs in this

Mr. Evan Roberts

May 12, 2015

Page 3 of 3

=====

area include four rock check dams installed along the ditch draining to this runoff location and one larger rock check dam adjacent to the road. These storm water BMPs are inspected bi-weekly to ensure proper function, per the Permit.

As noted above, we will submit under separate cover photographic documentation that the disturbed area in the vicinity of the location where runoff is leaving the site at Cahaba Road has been seeded and mulched. Vegetation can greatly reduce the amount of sediment in storm water runoff. This area will continue to be inspected as part of the facility's bi-weekly routine operations in order to ensure a stand of vegetation is established and maintained.

Inspection Comment #4: **Storm water from disturbed area was observed entering drainage ditch north and downgradient of sampling point DSN001-2.**

Response: *As mentioned above, Arrowhead Landfill acknowledges that disturbed areas at the facility required grassing during the inspection on April 17, 2015. We will forward photographic documentation under separate cover that the subject disturbed area (the area northeast of DSN001-2) has been seeded and mulched in order to establish vegetation and stabilize the area. No landfill industrial activities are conducted in or around the disturbed area. This area will continue to be maintained to prevent sediment from leaving the site via storm water runoff. Should industrial activities be conducted in this location in the future, the need for an additional outfall will be reevaluated.*

Should you have any questions, please call.

Sincerely,

HODGES, HARBIN, NEWBERRY & TRIBBLE, INC.


William F. Hodges, P.E.
Professional Engineer

Enclosure

cc: Scott Story (w/enclosure)
 Lee Warren (w/enclosure)
 Oscar Allen (w/enclosure)
 James Ashburn (w/enclosure)

Brent Watson (w/enclosure)
Ernest Kaufmann (w/enclosure)
Thad Owings (w/enclosure)
Joy Hammonds (w/enclosure)

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN

FOR
ARROWHEAD LANDFILL
PERRY COUNTY ASSOCIATES, LLC
622 TAYLOE ROAD
UNIONTOWN, AL 36786

PERRY COUNTY, ALABAMA

Original Date of Plan:
Date of Last Plan Amendment / P.E. Certification:
Date of Last Plan Review:
Designated Person Accountable for Spill Prevention:
(Referred to as Facility Response Coordinator in Plan)

August 15, 2009
January 2015
January 2015
James Ashburn



HODGES, HARBIN,
NEWBERRY & TRIBBLE, INC.

Consulting Engineers



The following table is a listing and brief description of the current petroleum storage on-site:

TABLE 1		
Tank Number/ Other Type of Container(s)	Description (gallons, construction, containment, etc.)	Location (above or below ground, location on site)
1.	100-gallon transmission fluid	aboveground; on mobile maintenance truck that is parked over landfill liner when not in use.
2.	125-gallon motor oil	aboveground; on mobile maintenance truck that is parked over landfill liner when not in use.
3.	55-gallon gear oil	aboveground; on mobile maintenance truck that is parked over landfill liner when not in use.
4.	100-gallon anti-freeze	aboveground; on mobile maintenance truck that is parked over landfill liner when not in use.
5.	150-gallon hydraulic fluid	aboveground; on mobile maintenance truck that is parked over landfill liner when not in use.
6.	1,800-gallon diesel tank	aboveground; on mobile maintenance truck that is parked over landfill liner when not in use.
7.	150-gallon used oil	aboveground; on mobile maintenance truck that is parked over landfill liner when not in use.
TOTAL = ±2,480 gallons		
Note: 1. The mobile maintenance truck will be parked over the landfill liner when not in use. The landfill liner is sufficient to contain 110% of the single largest tank volume.		

Equipment on-site which contains petroleum consists of: Dump Truck(s), Backhoe(s), Compactor(s), and D6 Dozer(s). The oil products used by these pieces of equipment are considered "motive power containers" as defined in 40 CFR 112.2 and are exempt from the SPCC Rule in accordance with 40 CFR 112.1(d)(7).

All equipment is visually inspected daily for leaks.

4.3 Drainage Pathway and Distance to Navigable Water

The landfill is located in Perry County, Alabama at 622 Tayloe Road Uniontown, AL 36786. All areas of the landfill drain via ditches and sediment ponds to an unnamed tributary of Tayloe Creek.





Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

MAY 22 2015

ERNEST KAUFMANN, PRESIDENT
PERRY COUNTY ASSOCIATES LLC
622 TAYLOE ROAD
UNIONTOWN AL 36786

RE: Compliance Evaluation Inspection
Arrowhead Landfill
622 Tayloe Road
Uniontown, AL 36786
General NPDES Permit No. ALG160167
Perry County (105)

Dear Mr. Kaufmann:

The Department has received your May 12, 2015 response to the Compliance Evaluation Inspection (CEI) conducted on April 17, 2015.

During the inspection, the inspector observed storm water drainage from a concrete pipe storage area in the southeastern portion of the property. The land was not sufficiently vegetated or stabilized to prevent erosion during storm water runoff. At the time of inspection, turbid storm water from this area was observed leaving the landfill property near the southeast corner of the facility. The upstream and downstream turbidity difference of the stream receiving the runoff was 21.2 NTUs, which was within the water quality criteria of no greater than 50 NTUs. These issues were addressed by the permittee in a letter received by the Department on May 12, 2015. Below is the Department's response to the comments made on behalf of the permittee, Arrowhead Landfill:

Inspection Comment #1: Disturbed areas that were not currently in use had not been vegetated or otherwise stabilized. Your response indicated that these areas would be seeded and mulched. It was also indicated that these areas will continue to be inspected twice per week as part of the facility operations in order to ensure vegetation is established and maintained. *The facility should maintain logs of these inspections such that they are available to the Department during site inspections. The Department has not received the photographs which were referenced in your response. However, a phone call from your consultant, Clint Courson of Hodges, Harbin, Newberry and Tribble, Inc., on May 21, 2015, indicated they are forthcoming. Within 30 days from receipt of this letter, please provide photographs (with dates) to the Water Division that document the progress of vegetation establishment.*

Inspection Comment #2: No fuel or chemical storage. Leachate tank was within secondary containment. Your response referred to the facility's Spill Prevention, Control and Countermeasure Plan. Tanks and onsite petroleum storage are all located on the mobile maintenance truck. *This inspection comment was an observation made by the inspector and not a noted deficiency.*

Inspection Comment #3: Turbid stormwater observed leaving landfill property near southeast corner of facility, at latitude 32.41019, longitude -87.46792, was not a permitted outfall. This stormwater drained from an unused storage field that was not stabilized, but not from landfill cells. Your response indicated that permit coverage would not be applicable to this area since landfill activity was not occurring at that location and the turbidity observed would have been within permit limits. You also indicated that this area would be re-vegetated and inspected bi-weekly to ensure the vegetation remains established. *As indicated above, please provide photographs to the Water Division that document the progress of vegetation establishment and maintenance. Please note that the permittee should implement and maintain adequate Best Management Practices (BMPs) to minimize or prevent the discharge of solids.*

Inspection Comment #4: Stormwater from disturbed area was observed entering drainage ditch north and down gradient of sampling point for DSN 001-2. Your response reiterated that industrial activity did not occur in or around the disturbed area and that the area would be re-vegetated. *This inspection comment was an observation made by the inspector.*

To document vegetation of the area in question, no later than 90 days from receipt of this letter, please provide photographs (with dates) to the Department that document the progress of vegetation establishment, and the continued maintenance of the vegetation. The submittal should be mailed to **Dodi Moseley** in the Department at the Montgomery address shown at the top of this letter.

The Department encourages you to voluntarily consider pollution prevention strategies to prevent potential future violations.

If you have questions regarding this matter, please contact Dodi Moseley by email at dbmoseley@adem.state.al.us or by phone at (334) 271-7725.

Sincerely,



Lee Warren, Chief
Industrial General Permit Section
Water Division

LW/dbm

File: CEI/17668

Encl(s): CEI Report

Pc: Lee Warren, ADEM, Industrial General Permit Section
Dodi Moseley, ADEM, Industrial General Permit Section
Brad Stearns, ADEM, Water Division
Derick Houston, ADEM, Field Operations Division, Birmingham
Evan Roberts, ADEM, Field Operations Division, Birmingham
Eric Sanderson, ADEM, Land Division



Alabama Department of Environmental Management
NPDES INSPECTION REPORT

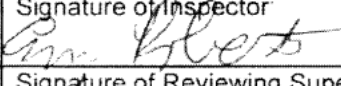
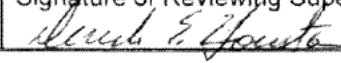
Company/Operator/Permittee: Perry County Associates, LLC		FID 35125 7	Phone Number: (770)720-2717	
Mailing Address: 622 Tayloe Road		City Uniontown	State AL	Zip Code 36786
Responsible Official/Operator Name: Ernest Kaufmann				

Facility Name: Arrowhead Landfill	NPDES Permit #: ALG160167	Permit Effect Date: 02/01/2012	Inspection Entry Date & Time: 4/17/2015 11:10 AM	County: Perry
Activity Description Landfill	NMS Inspection #: 48836	Permit Expire Date: 01/31/2017	Inspection Exit Date & Time: 4/17/2015 2:59 PM	Report Complete Date 4/20/2015
Inspection Type: (X) CEI () CSI () PAI Routine () Complaint (X) Photos Taken (X) Samples Collected (X)				

Township, Range, Section: T17N, R6E, S28
Physical Address/Location Description (include nearest city): County Road 1, near Perry, AL

Entrance Latitude & Longitude: 32.413512, -87.473396
Discharge Point(s) Latitude & Longitude: 32.41486, -87.465887, 32.41481, -87.47281; 32.41019, -87.46792
Receiving Water(s): UT Tayloe Creek, UT Chilatchee Creek
Weather Conditions: Intermittent rain, warm

Summary Disturbed areas that were not currently in use had not been vegetated or otherwise stabilized. Stormwater from disturbed area was observed entering drainage ditch north and downgradient of sampling point for DSN 001-2. Turbid stormwater observed leaving landfill property near southeast corner of facility, at latitude 32.41019, longitude -87.46792, was not a permitted outfall. This stormwater drained from an unused storage field that was not stabilized, but not from landfill cells. Turbidity of the stormwater discharge alongside County Road 21 was 118 NTUs. Turbidity of the unnamed tributary of Chilatchee Creek upstream of the discharge was 34.5 NTUs. Turbidity of the unnamed tributary of Chilatchee Creek downstream of the discharge was 55.7 NTUs, a difference of 21.2 NTUs.
--

Name(s) of On-site Representative(s) and Phone Numbers: Thad Owings, (770)7250-2717		
Name of Inspector: Evan Roberts	Signature of Inspector: 	Date: 4/20/2015
Name of Reviewing Supervisor: Derick Houston	Signature of Reviewing Supervisor: 	Date: 4/20/2015

FOD Office: Birmingham

NPDES INDUSTRIAL STORMWATER INSPECTION REPORT

FACILITY NAME: Arrowhead Landfill		PERMIT NUMBER: ALG160167			
I. RECORDS					
A. Copy of Permit Available	N/A	X YES	NO	Comment #	
B. Discharge Monitoring Reports (DMRs) Available	N/A	X YES	NO	Comment #	
DMRs Retained for 3 Years	N/A	X YES	NO	Comment #	
C. Laboratory Records Available	N/A	X YES	NO	Comment #	
Laboratory Records Retained for 3 Years	N/A	X YES	NO	Comment #	
D. Commercial Lab Used for Reported Analyses	N/A	X YES	NO	Comment #	
Name: Analytical Services, Inc.	Location: Norcross, GA				
E. Adequate Records Maintained of:					
1. Sample Date, Time and Location	N/A	X YES	NO	Comment #	
2. Analyses Date and Time	N/A	X YES	NO	Comment #	
3. Analytical Methods	N/A	X YES	NO	Comment #	
4. Standard Methods/EPA Approved Analytical Method	N/A	X YES	NO	Comment #	
5. Analyst	N/A	X YES	NO	Comment #	
6. Lab Equipment Calibration and Maintenance	N/A	X YES	NO	Comment #	
7. Rainfall Data	N/A	X YES	NO	Comment #	
F. Correct Name and Mailing Address of Permittee	N/A	X YES	NO	Comment #	
II. POLLUTION PREVENTION PRACTICES/PLANS					
A. Best Management Practices (BMP) Plan Available	N/A	X YES	NO	Comment #	
Last Update to BMP Plan: January 2015					
B. BMP Measures Appear Adequate, If no provide	N/A	YES	X NO	Comment # 1	
C. BMP Training Records Available	N/A	X YES	NO	Comment #	
D. BMP Inspection Records Available	N/A	X YES	NO	Comment #	
Inspection Records Retained for 3 Years	N/A	X YES	NO	Comment #	
E. Spill Prevention Control and Countermeasures (SPCC) Plan Available	N/A	X YES	NO	Comment # 2	
Last Update to SPCC January 2015					
List Tanks and Capacities in Comment Section					
F. Pollution Prevention (P2)/Source Reduction Plan and/or P2 Practices	N/A	X YES	NO	Comment #	
G. All Discharges Appear to be properly Permitted	N/A	YES	X NO	Comment # 3	
H. Adequate Containment for Products/Byproducts and Waste Materials	N/A	X YES	NO	Comment #	
III. MONITORING INFORMATION					
A. Flow Measurement					
Method of measurement on Non-Stormwater Outfalls. Instantaneous Weir Other					
B. Sampling					
1. Location(s) Adequate	N/A	YES	X NO	Comment # 4	
2. Sample Type(s) Agree with Permit	N/A	X YES	NO	Comment #	
3. Preservation Techniques Agree with 40 CFR 136	N/A	X YES	NO	Comment #	
4. Sample Holding Times Agree with EPA Guidance	N/A	X YES	NO	Comment #	
5. Monitoring and Analyses Performed More Frequently Than Required	N/A	YES	X NO	Comment #	
6. If Yes to 5, Results are Reported in Permittee's Self Monitoring Report	X N/A	YES	NO	Comment #	
7. Stormwater Samples Collected in Accordance with Permit Requirements	N/A	X YES	NO	Comment #	

N/A – Not Applicable

NPDES INDUSTRIAL STORMWATER INSPECTION REPORT

IV. EFFLUENT/RECEIVING WATER VISUAL OBSERVATIONS			
Outfall(s) have Oil Sheen	YES	<input checked="" type="checkbox"/> NO	Comment #
Outfall(s) have Visible Foam	YES	<input checked="" type="checkbox"/> NO	Comment #
Outfall(s) have Visible Floating Solids	YES	<input checked="" type="checkbox"/> NO	Comment #
V. COMMENTS			
Comment No.	Comment		Photograph No.
1	Disturbed areas that were not currently in use had not been vegetated or otherwise stabilized.		3, 14-16
2	No fuel or chemical storage. Leachate tank was within secondary containment.		17-18
3	Turbid stormwater observed leaving landfill property near southeast corner of facility, at latitude 32.41019, longitude -87.46792, was not a permitted outfall. This stormwater drained from an unused storage field that was not stabilized, but not from landfill cells.		1-9
4	Stormwater from disturbed area was observed entering drainage ditch north and downgradient of sampling point for DSN 001-2		11-16
VI. SAMPLE RESULTS			
Turbidity of stormwater discharge alongside County Road 21 was 118 NTUs.			
Turbidity of the unnamed tributary of Chilatchee Creek upstream of the discharge was 34.5 NTUs.			
Turbidity of the unnamed tributary of Chilatchee Creek downstream of the discharge was 55.7 NTUs, a difference of 21.2 NTUs			

LANCE R. LEFLEUR
DIRECTOR



ROBERT J. BENTLEY
GOVERNOR

Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

April 20, 2015

Ernest Kaufmann
Perry County Associates, LLC
622 Tayloe Road
Uniontown AL 36786

RE: Facility Inspection
Arrowhead Landfill
NPDES Permit # ALG160167
FID 35125.7
Perry County (105)
Inspected 4/17/2015

Dear Mr. Kaufman:

Enclosed is a copy of an inspection report for the above referenced facility. A copy of the inspection report has been transmitted to the Department's Water Division for a compliance determination and any follow-up as appropriate.

Should you have any questions regarding permitting, compliance, enforcement, or any follow-up action you should take to address any deficiencies noted, please contact your ADEM permit staff contact or the Water Division in Montgomery at H2Omail@adem.state.al.us or by phone at (334) 271-7799.

Should you have any questions regarding observations noted during the inspection, please contact me by email at elroberts@adem.state.al.us or by phone at (205) 942-6168.

Sincerely,

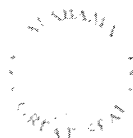
A handwritten signature in black ink, appearing to read "Evan Roberts", is written over a horizontal line.

Evan Roberts
Birmingham Branch
Field Operations Division

File: INSPR/17668
ecopy: Water Division
Enclosure: Inspection Report

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209 4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Branch
2715 Sandlin Road, S. W.
Decatur, AL 35603 1333
(256) 353-1713
(256) 340-9359 (FAX)



Mobile Branch
2204 Perimeter Road
Mobile, AL 36615 1131
(251) 450-3400
(251) 479-2593 (FAX)

Mobile-Coastal
4171 Commanders Drive
Mobile, AL 36615-1421
(251) 432-6533
(251) 432-6598 (FAX)

H. LARRY TRIBBLE, JR., P.E.
WILLIAM E. HODGES, P.E.
W. MICHAEL STURM, P.E.
R. BRANT LADD, P.E.
CLINT L. COURSON, CHMM
K. MATTHEW CHURCH, P.E.
DANIEL E. CHIFFE, P.E.
KEVIN G. BERRY, P.E.

HHNT
HODGES, HARBIN,
NEWBERRY & TRIBBLE, INC.
Consulting Engineers

NATHAN D. DUNN, P.E.
RYAN S. WILLOUGHBY, P.E.
WILLIAM A. GRANICH, P.E.
ROBERT D. HELLER, CHMM
ERIC P. JACKSON, P.E.
DAVID E. BATTISON, P.E.
RYAN S. PETERS, P.E.
WILLIAM M. REESE, P.E.

June 8, 2015

Ms. Dodi Moseley
Industrial General Permit Section, Southwest
Industrial/ Municipal Branch
Water Division
1400 Coliseum Boulevard
Montgomery, AL 36110

**RE: Arrowhead Landfill
Compliance Evaluation Inspection – Photographic Documentation
General NPDES Permit No. ALG160167
HHNT Project No. 3006-029-13**


Dear Ms. Moseley,

Please find attached photographic documentation of the seeding and mulching that has been applied in the disturbed areas noted during the facility inspection on April 17, 2015. In accordance with the ADEM response letter from Ms. Lee Warren dated May 22, 2015, we will submit follow up photographic documentation showing the establishment and maintenance of vegetation in these areas within 90 days of receipt of the letter (before August 20, 2015).

Should you have any questions, please call.

Sincerely,

HODGES, HARBIN, NEWBERRY & TRIBBLE, INC.


Clint L. Courson, CHMM
Environmental Scientist

CLC/kw

cc: Lee Warren (w/ enclosure)
Evan Roberts (w/ enclosure)
Ernest Kaufmann (w/ enclosure)
Oscar Allen (w/ enclosure)
Thad Owings (w/ enclosure)
James Ashburn (w/ enclosure)
Michelle Coleman (w/ enclosure)

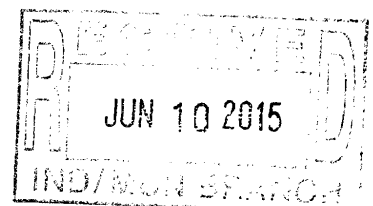




PHOTO 1: Area northwest of scalehouse/ office



PHOTO 2: Area northwest of scalehouse/ office

Project No: 3006-029-13

Date: June 2015

Sheet 1 of 3

Arrowhead Landfill

**Photographic Documentation of Seeding & Mulching:
Disturbed Area Adjacent to Scalehouse/ Office and
Disturbed Areas Adjacent to Leachate Tank**



**HODGES, HARBIN,
NEWBERRY & TRIBBLE, INC.**

Consulting Engineers



PHOTO 3: Area northwest of scalehouse/ office



PHOTO 4: Area adjacent to leachate tank

Project No: 3006-029-13

Date: June 2015

Sheet 2 of 3

Arrowhead Landfill

Photographic Documentation of Seeding & Mulching:

**Disturbed Area Adjacent to Scalehouse/ Office and
Disturbed Areas Adjacent to Leachate Tank**



**HODGES, HARBIN,
NEWBERRY & TRIBBLE, INC.**

Consulting Engineers



PHOTO 5: Area adjacent to leachate tank



PHOTO 6: Area adjacent to leachate tank

Project No: 3006-029-13

Date: June 2015

Sheet 3 of 3

Arrowhead Landfill

Photographic Documentation of Seeding & Mulching:

**Disturbed Area Adjacent to Scalehouse/ Office and
Disturbed Areas Adjacent to Leachate Tank**



**HODGES, HARBIN,
NEWBERRY & TRIBBLE, INC.**

Consulting Engineers

H. LOWRY TRIBBLE, JR., P.E.
WILLIAM F. HODGES, P.E.
W. MICHAEL STUBBS, P.E.
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ERIC P. JACKSON, P.E.
DAVID E. BATTSON, P.E.
RYAN S. PETERS, P.E.
WILLIAM M. REESE, P.E.

August 19, 2015

Ms. Dodi Moseley
Industrial General Permit Section, Southwest
Industrial/ Municipal Branch
Water Division
1400 Coliseum Boulevard
Montgomery, AL 36110

**RE: Arrowhead Landfill
Compliance Evaluation Inspection
General NPDES Permit No. ALG160167
HHNT Project No. 3006-029-13**

Dear Ms. Moseley,

As requested in Ms. Lee Warren's letter dated May 22, 2015, please find attached photographic documentation of the vegetation that has been established in the disturbed areas noted during the facility inspection on April 17, 2015. This vegetation will continue to be maintained and inspected regularly by landfill personnel. Additionally, these photographs document that the concrete pipes that were previously stored near the leachate tank have been removed from the property as discussed on July 16, 2015.

Should you have any questions, please call.

Sincerely,

HODGES, HARBIN, NEWBERRY & TRIBBLE, INC.


Clint L. Courson, CHMM
Environmental Scientist

CLC/tw

Enclosure

cc: Lee Warren (w/ enclosure)
Evan Roberts (w/ enclosure)
Ernest Kaufmann (w/ enclosure)
Oscar Allen (w/ enclosure)
Thad Owings (w/ enclosure)
James Ashburn (w/ enclosure)
Michelle Coleman (w/ enclosure)





PHOTO 1: Area adjacent to leachate tank



PHOTO 2: Area northwest of scalehouse/ office



Project No: 3006-029-13

Date: August 19, 2015

Figure 1 of 1

Arrowhead Landfill
**Photographic Documentation of
 Established Vegetation in Disturbed
 Areas and Removal of Concrete Pipes**

HHNT
 — HODGES, HARBIN, —
 NEWBERRY & TRIBBLE, INC.
Consulting Engineers



Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

November 16, 2015

Ernest Kaufmann
Perry County Associates, LLC
134 Riverstone Terrace, Suite 203
Canton GA 30114

RE: Facility Inspection
Arrowhead Landfill
NPDES Permit # ALG160167
FID 35125.10
Perry County (105)
Inspected 11/13/2015

Dear Mr. Kaufmann:

Enclosed is a copy of an inspection report for the above referenced facility. A copy of the inspection report has been transmitted to the Department's Water Division for a compliance determination and any follow-up as appropriate.

Should you have any questions regarding permitting, compliance, enforcement, or any follow-up action you should take to address any deficiencies noted, please contact your ADEM permit staff contact or the Water Division in Montgomery at H2Omail@adem.state.al.us or by phone at (334) 271-7799.

Should you have any questions regarding observations noted during the inspection, please contact me by email at elroberts@adem.state.al.us or by phone at (205) 942-6168.

Sincerely,

Evan Roberts
Birmingham Branch
Field Operations Division

File: INSPR/17668
ecopy: Water Division
Enclosure: Inspection Report





Alabama Department of Environmental Management
NPDES INSPECTION REPORT


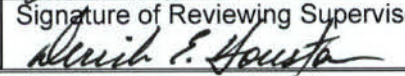
Company/Operator/Permittee: Perry County Associates, LLC		FID 35125.10		Phone Number: (770)720-2717	
Mailing Address: 134 Riverstone Terrace, Suite 203		City Canton		State GA	Zip Code 30114
Responsible Official/Operator Name: Ernest Kaufmann					

Facility Name: Arrowhead Landfill	NPDES Permit #: ALG160167	Permit Effect Date: 02/01/2012	Inspection Entry Date & Time: 11/13/2015 12:49 PM	County: Perry
Activity Description Solid Waste Landfill	NMS Inspection #: 51277	Permit Expire Date: 01/31/2017	Inspection Exit Date & Time: 11/13/2015 2:57 PM	Report Complete Date: 11/16/2015
Inspection Type: (X) CEI () CSI () PAI Routine () Complaint (X) Photos Taken (X) Samples Collected ()				

Township, Range, Section: T17N, R6E, S23
Physical Address/Location Description (include nearest city): County Road 1, near Perry, AL

Entrance Latitude & Longitude: 32.413512, -87.473396
Discharge Point(s) Latitude & Longitude: 32.41486, -87.465887, 32.41481, -87.47281; 32.41019, -87.46792
Receiving Water(s): UT Tayloe Creek, UT Chilatchee Creek
Weather Conditions: Partly cloudy and cool

Summary: Inspection was conducted in response to a complaint of a whitish discharge on the south side of the facility. Stormwater was observed leaving landfill property near southeast corner of facility, at latitude 32.41019, longitude -87.46792, downgradient from non-landfill areas. This area had a slight discharge. See sample results on page 3. Areas not in use had been grassed since the 4/17/2015 inspection. Grass was patchy in area near southeast side of facility. Facility outfalls were not discharging. According to facility records, pH was analyzed out of holding time for samples collected on 6/29/2015.

Name(s) of On-site Representative(s) and Phone Numbers: John Sikes, (334)247-2126		
Name of Inspector: Evan Roberts	Signature of Inspector: 	Date: 11/16/2015
Name of Reviewing Supervisor: Derick Houston	Signature of Reviewing Supervisor: 	Date: 11/16/2015

FOD Office: Birmingham

NPDES INDUSTRIAL STORMWATER INSPECTION REPORT

FACILITY NAME: Arrowhead Landfill		PERMIT NUMBER: ALG160167		
I. RECORDS				
A. Copy of Permit Available	N/A	X YES	NO	Comment #
B. Discharge Monitoring Reports (DMRs) Available	N/A	X YES	NO	Comment #
DMRs Retained for 3 Years	N/A	X YES	NO	Comment #
C. Laboratory Records Available	N/A	X YES	NO	Comment #
Laboratory Records Retained for 3 Years	N/A	X YES	NO	Comment #
D. Commercial Lab Used for Reported Analyses	N/A	X YES	NO	Comment #
Name: Analytical Services, Inc.	Location: Norcross, GA			
E. Adequate Records Maintained of::				
1. Sample Date, Time and Location	N/A	X YES	NO	Comment #
2. Analyses Date and Time	N/A	X YES	NO	Comment #
3. Analytical Methods	N/A	X YES	NO	Comment #
4. Standard Methods/EPA Approved Analytical Method	N/A	X YES	NO	Comment #
5. Analyst	N/A	X YES	NO	Comment #
6. Lab Equipment Calibration and Maintenance	N/A	X YES	NO	Comment #
7. Rainfall Data	N/A	X YES	NO	Comment #
F. Correct Name and Mailing Address of Permittee	N/A	X YES	NO	Comment #
II. POLLUTION PREVENTION PRACTICES/PLANS				
A. Best Management Practices (BMP) Plan Available	N/A	X YES	NO	Comment #
Last Update to BMP Plan: January 2015				
B. BMP Measures Appear Adequate, If no provide	N/A	X YES	NO	Comment #
C. BMP Training Records Available	N/A	X YES	NO	Comment #
D. BMP Inspection Records Available	N/A	X YES	NO	Comment #
Inspection Records Retained for 3 Years	N/A	X YES	NO	Comment #
E. Spill Prevention Control and Countermeasures (SPCC) Plan Available	N/A	X YES	NO	Comment # 1
Last Update to SPCC: January 2015				
List Tanks and Capacities in Comment Section				
F. Pollution Prevention (P2)/Source Reduction Plan and/or P2 Practices	N/A	X YES	NO	Comment #
G. All Discharges Appear to be properly Permitted	N/A	X YES	NO	Comment #
H. Adequate Containment for Products/Byproducts and Waste Materials	N/A	X YES	NO	Comment #
III. MONITORING INFORMATION				
A. Flow Measurement				
Method of measurement on Non-Stormwater Outfalls: Instantaneous Weir Other				
B. Sampling				
1. Location(s) Adequate	N/A	X YES	NO	Comment #
2. Sample Type(s) Agree with Permit	N/A	X YES	NO	Comment #
3. Preservation Techniques Agree with 40 CFR 136	N/A	X YES	NO	Comment #
4. Sample Holding Times Agree with EPA Guidance	N/A	YES	X NO	Comment # 2
5. Monitoring and Analyses Performed More Frequently Than Required	N/A	YES	X NO	Comment #
6. If Yes to 5, Results are Reported in Permittee's Self Monitoring Report	X N/A	YES	NO	Comment #
7. Stormwater Samples Collected in Accordance with Permit Requirements	N/A	X YES	NO	Comment #

N/A – Not Applicable

NPDES INDUSTRIAL STORMWATER INSPECTION REPORT

IV. EFFLUENT/RECEIVING WATER VISUAL OBSERVATIONS

Outfall(s) have Oil Sheen	YES	X NO	Comment #
Outfall(s) have Visible Foam	YES	X NO	Comment #
Outfall(s) have Visible Floating Solids	YES	X NO	Comment #

V. COMMENTS

Comment No.	Comment	Photograph No.
1	No fuel or chemical storage. Leachate tank was within secondary containment.	
2	pH was analyzed out of holding time for samples collected on 6/29/2015.	

VI. SAMPLE RESULTS

- Outfalls were not discharging.
- Stormwater discharge alongside County Road 21:
- pH = 7.50 s.u
- Dissolved oxygen = 5.18 mg/L
- Turbidity = 9.64 NTUs.

Perry County Associates, LLC
Arrowhead Landfill
ALG160167

Perry County
Evan Roberts
November 13, 2015

Area had been grassed since previous inspection. Grass was patchy.



To right of previous. Area had been grassed since previous inspection. Grass was patchy.



3

Drainage ditch downgradient of previous photo.



4

Landfill area. Road. Drainage ditch for non-landfill areas.



5

Drainage ditch downgradient of non-landfill areas.



6

Pool of water. Check dam.



Edge of pool.



Minimal discharge from pool to roadside ditch.



Light-colored sediment staining on leaves around roadside ditch.



Pond for outfall 001-2.



11

Outfall 001-2 was not discharging.



No flow.

12

Area near outfall 001-2 had been grassed since previous inspection.



13

To right of previous.



14

Pond for outfall 001-1.



15

Outfall 001-1 was not discharging.



16

Leachate tank.



17

Inside of secondary containment structure.



18

Moseley, Dorothy B

From: Warren, Lee
Sent: Wednesday, December 09, 2015 4:10 PM
To: aracoordinator@gmail.com
Cc: Stearns, Brad; Dean, Glenda; Guzman.Humberto@epa.gov
Subject: Arrowhead Landfill

Mr. Johnston,

RE: Perry County Associates LLC
Arrowhead Landfill - NPDES Permit Number ALG160167
622 Tayloe Road
Uniontown, AL 36786
Perry County (105)

What's the result of the most recent Inspector's report?

The most recent, 11/13/15, NPDES inspection report is in ADEM's e-File under ALG160167. Below is a link to the e-File system:

<http://app.adem.alabama.gov/eFile/>

Why is the landfill continuing to have unpermitted discharges and ADEM not issuing any permit violations?

The drainage area that the Department believes you are referencing has been evaluated and it does not currently appear to have industrial storage/industrial activities occurring; therefore, the outfall would not require NPDES permitting. Prior to an inspection of this area, Department personnel contacted you to determine the location of your complaint. If you believe the Department has not observed the area of your concern, please provide a map with the indicated area or the actual latitudinal / longitudinal coordinates for the Department's review.

Is ADEM giving all callers who are complaining of this landfill a complaint number?

Typically, each identified complainant is assigned a complaint number. Every online complaint receives a unique complaint number. However, if multiple complaints are received via telephone or via mail with the same pertinent information, they may be grouped under one complaint number for more efficient handling.

Are you able to visit the site yourself?

There have been multiple NPDES Permit inspections (4/17/15 and 11/13/15) conducted this year which are available for public review on the Department's e-File system.

When will the landfill stop violating its permit?

The Water Division is not aware of any NPDES compliance issues which have not been addressed.

Lee Warren
Chief, Industrial General Permit Section
Industrial / Municipal Branch
Water Division
Alabama Department of Environmental Management
1400 Coliseum Boulevard
Montgomery, AL 36110
dlw@adem.state.al.us
(334) 271-7845



Did you know you can submit your DMRs online using our newly enhanced E2 DMR Reporting System? To sign up and learn more, please visit the Department's E2 Reporting System webpage [here](#).

From: aracoordinator@gmail.com [mailto:aracoordinator@gmail.com] **On Behalf Of** Adam Johnston
Sent: Monday, December 07, 2015 4:13 PM
To: Dean, Glenda; Stearns, Brad
Subject: Continued runoff at Arrowhead

Dear ADEM,

Attached is a recent video from last Friday, December 4th, from the Arrowhead Landfill. There has been many days this landfill has been overflowing. I have a few questions for you:

What's the result of the most recent Inspector's report?

Why is the landfill continuing to have unpermitted discharges and ADEM not issuing any permit violations?

Is ADEM giving all callers who are complaining of this landfill a complaint number?

Are you able to visit the site yourself?

When will the landfill stop violating its permit?

--

Adam Johnston

Alabama Rivers Alliance
Alliance Coordinator
www.alabamarivers.org

2014 6th Ave North, Suite 200
Birmingham, AL 35203
205.322.6395

H. LOWRY TRIBBLE, JR., P.E.
WILLIAM F. HODGES, P.E.
W. MICHAEL STUBBS, P.E.
R. BRANT LANE, P.E.
CLINT L. COURSON, CHMM
K. MATTHEW CHEEK, P.E.
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KEVIN G. BERRY, P.E.



NATHAN D. DUNN, P.E.
RYAN S. WILLOUGHBY, P.E.
WILLIAM A. GRANICH, P.E.
ROBERT D. HELLER, CHMM
ERIC P. JACKSON, P.E.
DAVID E. BATTSON, P.E.
RYAN S. PETERS, P.E.
WILLIAM M. REESE, P.E.

December 16, 2015

Mr. Evan Roberts
Birmingham Branch
Field Operations Division
110 Vulcan Road
Birmingham, Alabama 35209

**Re: Arrowhead Landfill
ADEM Facility Inspection Response Letter
NPDES Permit No. ALG160167
HHNT Project No. 3006-029-13**

Dear Mr. Roberts:

On behalf of Arrowhead Landfill, this letter is in response to your storm water facility inspection report dated November 16, 2015 corresponding to your site visit on November 13, 2015. It is our understanding that your inspection visit was conducted in response to citizen complaints received from Mr. Adam Johnston of the Alabama River Alliance received on November 12, 2015, as well as similar anonymous complaints on November 12 and 13, 2015.

Arrowhead Landfill would like to respond to the comments on your inspection report, and to assure ADEM that the facility is dedicated to maintaining a high standard of environmental compliance. In order to provide a detailed response, we have listed each comment below in *italics* and the facility's responses and/or corrective actions in **bold**.

1. *Inspection Comment:* Grass was patchy in area near southeast side of facility.

Response: Attached is photographic documentation that hay and grass seed have been installed in the bare spots noted during the inspection. This will establish better vegetative cover in these areas. The photo was taken November 25, 2015.

2. *Inspection Comment:* According to facility records, pH was analyzed out of holding time for samples collected on 6/29/2015.

Response: Arrowhead Landfill acknowledges that pH monitoring was not conducted in accordance with EPA guidance during the first semi-annual sampling event of 2015. Use of the on-site pH meter is part of the established sampling procedures for the

=====

facility. An operator that has since been replaced did not take a pH reading in the field as required. The certified lab, ASI did run pH on the storm water samples collected on 6/29/2015 and although out of hold, the results were in compliance with the Permit. During the second semi-annual event of 2015 for the landfill conducted in November, the landfill operator took the pH reading in the field during sampling in accordance with EPA guidance. Efforts will be made to ensure compliance with this requirement including additional training and instruction to the operator.

On-going assessments of BMP improvements are being made and alternatives are being evaluated in order to improve onsite storm water management.

Should you have any questions, please call.

Sincerely,

HODGES, HARBIN, NEWBERRY & TRIBBLE, INC.



William F. Hodges, P.E.
Professional Engineer

WFH/tw

Enclosure

cc: Scott Story (w/ enclosure)
Lee Warren (w/ enclosure)
Brent Watson (w/ enclosure)
Ernest Kaufmann (w/ enclosure)
Oscar Allen (w/ enclosure)
Thad Owings (w/ enclosure)
Joy Hammonds (w/ enclosure)
Johnny Sikes (w/ enclosure)



PHOTO 1: Additional hay and grass seed have been spread on the area adjacent to leachate tank

Project No: 3006-029-13

Date: November 25, 2015

Figure 1 of 1

Arrowhead Landfill
**Photographic Documentation of
Additional Seeding and Hay Placed in
Bare Spots**

HHNT

HODGES, HARBIN,
NEWBERRY & TRIBBLE, INC.

Consulting Engineers

H. LOWRY TRIBBLE, JR., P.E.
WILLIAM F. HODGES, P.E.
W. MICHAEL STUBBS, P.E.
R. BRANT LANE, P.E.
CLINT L. COURSON, CHMM
K. MATTHEW CHEEK, P.E.
DANIEL E. CHEEK, P.E.
KEVIN G. BERRY, P.E.

HHNT
— HODGES, HARBIN, —
NEWBERRY & TRIBBLE, INC.
Consulting Engineers

NATHAN D. DUNN, P.E.
RYAN S. WILLOUGHBY, P.E.
WILLIAM A. GRANICH, P.E.
ROBERT D. HELLER, CHMM
ERIC P. JACKSON, P.E.
DAVID E. BATTSON, P.E.
RYAN S. PETERS, P.E.
WILLIAM M. REESE, P.E.

June 8, 2015

Ms. Dodi Moseley
Industrial General Permit Section, Southwest
Industrial/ Municipal Branch
Water Division
1400 Coliseum Boulevard
Montgomery, AL 36110

**RE: Arrowhead Landfill
Compliance Evaluation Inspection – Photographic Documentation
General NPDES Permit No. ALG160167
HHNT Project No. 3006-029-13**

Dear Ms. Moseley,

Please find attached photographic documentation of the seeding and mulching that has been applied in the disturbed areas noted during the facility inspection on April 17, 2015. In accordance with the ADEM response letter from Ms. Lee Warren dated May 22, 2015, we will submit follow up photographic documentation showing the establishment and maintenance of vegetation in these areas within 90 days of receipt of the letter (before August 20, 2015).

Should you have any questions, please call.

Sincerely,

HODGES, HARBIN, NEWBERRY & TRIBBLE, INC.


Clint L. Courson, CHMM
Environmental Scientist

CLC/kw

cc: Lee Warren (w/ enclosure)
Evan Roberts (w/ enclosure)
Ernest Kaufmann (w/ enclosure)
Oscar Allen (w/ enclosure)
Thad Owings (w/ enclosure)
James Ashburn (w/ enclosure)
Michelle Coleman (w/ enclosure)





PHOTO 1: Area northwest of scalehouse/ office



PHOTO 2: Area northwest of scalehouse/ office

Project No: 3006-029-13

Date: June 2015

Sheet 1 of 3

Arrowhead Landfill

Photographic Documentation of Seeding & Mulching:
Disturbed Area Adjacent to Scalehouse/ Office and
Disturbed Areas Adjacent to Leachate Tank



HODGES, HARBIN,
NEWBERRY & TRIBBLE, INC.
Consulting Engineers



PHOTO 3: Area northwest of scalehouse/ office



PHOTO 4: Area adjacent to leachate tank

Project No: 3006-029-13

Date: June 2015

Sheet 2 of 3

Arrowhead Landfill

Photographic Documentation of Seeding & Mulching:
Disturbed Area Adjacent to Scalehouse/ Office and
Disturbed Areas Adjacent to Leachate Tank



HODGES, HARBIN,
NEWBERRY & TRIBBLE, INC.
Consulting Engineers



PHOTO 5: Area adjacent to leachate tank



PHOTO 6: Area adjacent to leachate tank

Project No: 3006-029-13

Date: June 2015

Sheet 3 of 3

Arrowhead Landfill

Photographic Documentation of Seeding & Mulching:
Disturbed Area Adjacent to Scalehouse/ Office and
Disturbed Areas Adjacent to Leachate Tank



HODGES, HARBIN,
NEWBERRY & TRIBBLE, INC.
Consulting Engineers

• **Black Belt Citizens** •



Fighting for Health and Justice

P. O. Box 523, Uniontown, AL 36786

April 20, 2015

The Honorable Terri A. Sewell
U.S. House of Representatives
1133 Longworth HOB
Washington, D.C. 20515

HAND DELIVERED on 4-20-15

Dear Representative Sewell:

Thank you for your ongoing assistance with environmental matters affecting Alabama's Black Belt region. Without your help, we don't believe there is a chance of achieving a healthful environment in which our citizens, our children and our grandchildren can live and thrive.

We, the undersigned, represent the Black Belt Citizens Fighting for Health and Justice. We are the group that sounded the alarm for two years, with all the agencies involved, that the plans for the Uniontown wastewater treatment plant (WWTP) upgrades were flawed. We said that the proposed second spray field would never work, and that the city's engineer and ADEM had not adequately investigated or assessed the suitability of the new spray field site. Unfortunately, no one heeded our protests until after the \$4.8 million that you helped secure from the USDA was spent.

We are writing to request that you help the citizens of Uniontown to alleviate the continuing saga of our failed sewage system. You may not be aware that the Uniontown WWTP continues to discharge untreated sewage to our local creeks, subjecting our surface waters to the release of pathogens and other harmful pollution. This situation has existed for a horrifying 30 years and continues unchecked today. As you read this letter, untreated sewage is overflowing into Cottonwood Creek and Freetown Creek. Hundreds of thousands (often millions) of gallons of untreated sewage flow into these creeks EVERY day.

We believe that your assistance is critical at this juncture and we desperately need your intervention.

We understand that plans are under way for an alternative project to remediate the Uniontown sewage problems. Incredibly, the City is still relying on the advice of John Stevens of Sentell Engineering, the same engineer that designed the original upgrades that did not solve the

problems. We have no confidence in John Stevens and find him lacking in judgment, unprofessional and negligent. We want the City to seek the advice of a different qualified professional engineer who is capable of designing the best system for our circumstances.

Meanwhile, the City and John Stevens are working behind closed doors, developing a plan to pipe and pump our sewage to the Black Warrior River near Demopolis via a 20+ mile pipeline. In addition to the huge cost of construction of the pipeline and pump stations, this project requires obtaining 20+ miles of easements from affected property owners. Furthermore, this plan cannot possibly take into account all the future costs of operation, maintenance, and repairs that will have to be borne by Uniontown's citizens.

The cost to enact this plan will be an even bigger misuse of taxpayer dollars. The City and John Stevens have already wasted millions of dollars constructing a wastewater spray field system that will not work, and ADEM did not intervene in time to stop it. The plan they are working on now will be a debacle of monumental proportions.

A new pipeline to the Black Warrior River would take years to complete and the expenditure of additional millions in federal grant money--money that should be spent wisely. To the best of our knowledge, there is no plan to further upgrade the treatment plant. Therefore, the pipeline will merely divert poorly treated sewage to a larger river in an attempt to dilute the pollution. The goal should not be merely to move the polluting wastewater from one location to another, but instead to properly treat the pollution at its source.

We are also concerned that the plan to divert sewage to the Black Warrior River will adversely affect Uniontown by removing our local water resources. Uniontown's groundwater is a treasured resource, and piping the water to another area steals away our local environmental habitat and robs us of our potential for recreational pleasure. Our water resources are needed here in Uniontown, and the water should remain here to support and enhance our way of life.

The ONLY reasonable course of action to provide a long term solution for Uniontown is to convert our WWTP to a mechanical system that will clean the wastewater to a proper degree so that it can be legally discharged to our local streams. This course of action would resolve the issue of continuing to pollute waters of the state while preserving our water resources for our own benefit.

For many years, Uniontown has been an environmentally overburdened community. Our citizens have suffered from an unfair and excessive number of negative environmental impacts, which we struggle to cope with every day. With respect to the development of plans to remediate the WWTP, city officials have deliberately kept Uniontown's citizens out of the loop, in spite of our repeated requests for citizen participation. We continue to be uninformed about the status of these plans and to be denied any voice in critical decisions that will affect us environmentally and financially for decades to come.

The exclusion of Uniontown's citizens from fair treatment and meaningful involvement in these decisions is a violation of Title VI of the Civil Rights Act of 1964 as well as a blatant

example of environmental injustice. We feel that the USDA, the EPA and ADEM have a serious legal obligation to ensure that Uniontown does not suffer yet another injustice.

We urge you to put a stop to the ill-conceived plan currently being pursued to pipe wastewater to the Black Warrior River. We also urge you to join us in calling for a financial audit of the \$4.8 million in USDA grant and loan funds spent on the earlier WWTP upgrades, which did not result in achieving compliance with the federal Clean Water Act as intended.

Please help guide our local leaders to build the functional, effective wastewater treatment system that the citizens of Uniontown deserve.

Thank you so very much for your continuing efforts to help us.

Sincerely,

BLACK BELT CITIZENS FIGHTING FOR HEALTH AND JUSTICE

Esther Calhoun, President
334-349-8017

Ben Eaton, Vice President
334-507-8951

Ellis B. Long, Secretary
334-231-5351

Mary Leila Schaeffer, Treasurer
334-231-5161

cc: Velveta Golightly-Howell, Director, EPA Office of Civil Rights, Washington, D.C.
Joe Leonard, Jr., Assistant Secretary for Civil Rights, USDA, Washington, D.C.
Allen Bowen, USDA Rural Development, Montgomery, AL
Nelson Brooke, Black Warrior Riverkeeper, Birmingham, AL
Lydia Seabol Avant, The Tuscaloosa News, Tuscaloosa, AL

FINAL DETERMINATION

Permit Modification
Perry County Associates, LLC
134 Riverstone Terrace, Suite 203
Canton, GA 30114

Arrowhead Landfill
Permit No. 53-03

February 29, 2016

On February 11, 2016, the Department received a request from HHNT, Inc. on behalf of Perry County Associates, LLC to reduce the permitted landfill boundary to 973.85 acres (a reduction of 3.12 acres). In addition, the application also requests the modification of the methane monitoring points to reflect the changes in the property boundary.

The Land Division has determined that the modification of the permit meets the applicable requirements of ADEM's Administrative Codes Division 13.

Technical Contact:

Shane Lovett
Solid Waste Engineering Section
Land Division

LANCE R. LEFLEUR
DIRECTOR



Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

ROBERT J. BENTLEY
GOVERNOR

February 29, 2016

Mr. Ernest Kaufmann
President
Perry County Associates, LLC
134 Riverstone Terrace, Suite 203
Canton, GA 30114

RE: Permit Modification
Arrowhead Landfill
Permit No. 53-03

Dear Mr. Kaufmann:

On February 11, 2016, the Department received a request from HHNT, Inc. on behalf of Perry County Associates, LLC to reduce the permitted landfill boundary to 973.85 acres (a reduction of 3.12 acres). In addition, the application also requests the modification of the methane monitoring points to reflect the changes in the property boundary. The Department has reviewed and approves your request.

Enclosed please find the modified permit. The permit is effective February 29, 2016, and the expiration date will remain September 26, 2016. If you have any questions on this matter, please contact Mr. Shane Lovett of the Solid Waste Engineering Section at (334) 270-5628.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Scott Story".

S. Scott Story, Chief
Solid Waste Engineering Section
Land Division

SSS/sl





SOLID WASTE DISPOSAL FACILITY PERMIT

PERMITTEE: Perry County Associates, LLC

FACILITY NAME: Arrowhead Landfill

FACILITY LOCATION: Sections 21, 22, 27 and 28, Township 17 North, Range 6 East in Perry County.
The facility consists of 973.85 acres with a disposal area of 425.33 acres.

PERMIT NUMBER: 53-03

PERMIT TYPE: Municipal Solid Waste Landfill

WASTE APPROVED FOR DISPOSAL: Nonhazardous solid wastes, noninfectious putrescible and nonputrescible wastes including but not limited to household garbage, commercial waste, industrial waste, construction and demolition debris, tires, and other similar type materials. Special waste approved by ADEM may also be accepted.

APPROVED WASTE VOLUME: 15,000 tons per day

APPROVED SERVICE AREA: States of Alabama, Arkansas, Connecticut, Delaware, Florida, Georgia, Illinois, Indiana, Iowa, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, New Hampshire, New Jersey, New York, North Carolina, Ohio, Oklahoma, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Vermont, Virginia, West Virginia and Wisconsin

In accordance with and subject to the provisions of the Alabama Solid Wastes and Recyclable Materials Management Act, as amended, Code of Alabama 1975, SS 22-27-1 to 22-27-27 ("SWRMMA"), the Alabama Environmental Management Act, as amended, Code of Alabama 1975, SS 22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to dispose of the above-described solid wastes at the above-described facility location.

ISSUANCE DATE: September 27, 2011

EFFECTIVE DATE: September 27, 2011

MODIFICATION DATE: November 4, 2011, February 3, 2012, July 30, 2012, October 23, 2012, June 17, 2013, and February 29, 2016

EXPIRATION DATE: September 26, 2016


Alabama Department of Environmental Management

**ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
SOLID WASTE PERMIT**

Permittee: Perry County Associates, LLC
134 Riverstone Terrace, Suite 203
Canton, GA 30114

Landfill Name: Arrowhead Landfill

Landfill Location: Sections 21, 22, 27 and 28, Township 17 North, Range 6 East in Perry County, Alabama

Permit Number: 53-03

Landfill Type: Municipal Solid Waste

Pursuant to the Alabama Solid Wastes and Recyclable Materials Management Act, Code of Alabama 1975, §§ 22-27-1, *et seq.*, as amended, and attendant regulations promulgated thereunder by the Alabama Department of Environmental Management (ADEM), this permit is issued to Perry County Associates, LLC (hereinafter called the Permittee), to operate a solid waste disposal facility, known as the Arrowhead Landfill.

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions set forth herein (including those in any attachments), and the applicable regulations contained in Chapters 335-13-1 through 335-13-14 of the ADEM Administrative Code (hereinafter referred to as the "ADEM Admin. Code"). Rules cited are set forth in this document for the purpose of Permittee reference. Any Rule that is cited incorrectly in this document does not constitute grounds for noncompliance on the part of the Permittee. Applicable ADEM Administrative Codes are those that are in effect on the date of issuance of this permit or any revisions approved after permit issuance.

This permit is based on the information submitted to the Department on December 29, 2010 and as amended for permit renewal, and submitted to the Department on April 12, 2011, November 3, 2011, March 30, 2012, October 11, 2012, June 6, 2013, and February 11, 2016, and as amended for permit modification, and is known as the Permit Application (hereby incorporated by reference and hereinafter referred to as the Application). Any inaccuracies found in this information could lead to the termination or modification of this permit and potential enforcement action. The Permittee must inform ADEM of any deviation from or changes in the information in the Application that would affect the Permittee's ability to comply with the applicable ADEM Admin. Code or permit conditions.

This permit is effective as of September 27, 2011, modified on November 4, 2011, February 3, 2012, July 30, 2012, October 23, 2012, June 17, 2013, and February 29, 2016, and shall remain in effect until September 26, 2016, unless suspended or revoked.


Alabama Department of Environmental Management

2/29/16
Date Signed

SECTION I. STANDARD CONDITIONS

- A. Effect of Permit. The Permittee is allowed to dispose of nonhazardous solid waste in accordance with the conditions of this permit and ADEM Admin. Code Div. 13. Issuance of this permit does not convey property rights of any sort or any exclusive privilege, nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of state or local laws or regulations. Except for actions brought under Code of Alabama 1975, §§ 22-27-1, *et seq.*, as amended, compliance with the conditions of this permit shall be deemed to be compliance with applicable requirements in effect as of the date of issuance of this permit and any future revisions.
- B. Permit Actions. This permit may be suspended, revoked or modified for cause. The filing of a request for a permit modification or the notification of planned changes or anticipated noncompliance on the part of the Permittee, and the suspension or revocation does not stay the applicability or enforceability of any permit condition.
- C. Severability. The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
- D. Definitions. For the purpose of this permit, terms used herein shall have the same meaning as those in ADEM Admin. Code Division 13, unless this permit specifically provides otherwise; where terms are not otherwise defined, the meaning associated with such terms shall be as defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.
1. "EPA" for purposes of this permit means the United States Environmental Protection Agency.
 2. "Permit Application" for the purposes of this permit, means all permit application forms, design plans, operational plans, closure plans, technical data, reports, specifications, plats, geological and hydrological reports, and other materials which are submitted to the Department in pursuit of a solid waste disposal permit.
- E. Duties and Requirements.
1. Duty to Comply. The Permittee must comply with all conditions of this permit except to the extent and for the duration such noncompliance is authorized by a variance granted by the Department. Any permit noncompliance, other than noncompliance authorized by a variance, constitutes a violation of Code of Alabama 1975, §§ 22-27-1 *et seq.*, as amended, and is grounds for enforcement action, permit suspension, revocation, modification, and/or denial of a permit renewal application.
 2. Duty to Reapply. If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must apply for and obtain a new permit. The renewal application must be submitted to the Department at least 180 days before this permit expires.
 3. Permit Expiration. This permit and all conditions therein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application as required by Section I.E.2., and, through no fault of the Permittee, the Department has not made a final decision regarding the renewal application.
 4. Need to Halt or Reduce Activity Not A Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit.
 5. Duty to Mitigate. In the event of noncompliance with this permit, the Permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment.

6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of control (and related appurtenances) that are installed or used by the Permittee to achieve compliance with the conditions of this permit.
7. Duty to Provide Information. If requested, the Permittee shall furnish to ADEM, within a reasonable time, any information that ADEM may reasonably need to determine whether cause exists for denying, suspending, revoking, or modifying this permit, or to determine compliance with this permit. If requested, the Permittee shall also furnish the Department with copies of records kept as a requirement of this permit.
8. Inspection and Entry. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the employees of the Department or their authorized representative to:
 - a. Enter at reasonable times the Permittee's premises where the regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
 - c. Inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit.
 - d. Sample or monitor, at reasonable times, any substances or parameters at any location for the purposes of assuring permit compliance or as otherwise authorized by Code of Alabama 1975, §§ 22-27-1 *et seq.*
9. Monitoring, Corrective Actions, and Records.
 - a. Samples and measurements taken for the purpose of monitoring or corrective action shall be representative of the monitored activity. The methods used to obtain representative samples to be analyzed must be the appropriate method from Chapter 335-13-4 or the methods as specified in the Application attached hereto and incorporated by reference. Laboratory methods must be those specified in Standard Methods for the Examination of Water and Wastewater (American Public Health Association, latest edition), Methods for Chemical Analysis of Water and Wastes (EPA-600/4-79-020), Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (EPA Publication SW-846, latest edition), other appropriate EPA methods, or as specified in the Application. All field tests must be conducted using approved EPA test kits and procedures.
 - b. The Permittee shall retain records, at the location specified in Section I.I., of all monitoring, or corrective action information, including all calibration and maintenance records, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least three years from the date of the sample, measurement, report or record or for periods elsewhere specified in this permit. These periods may be extended by the request of the Department at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.
 - c. Records of monitoring and corrective action information shall include.
 - i. The exact place, date, and time of sampling or measurement.
 - ii. The individual(s) and company who performed the sampling or measurements.
 - iii. The date(s) analyses were performed.
 - iv. The individual(s) and company who performed the analyses.

- v. The analytical techniques or methods used.
 - vi. The results of such analyses.
- d. The Permittee shall submit all monitoring and corrective action results at the interval specified elsewhere in this permit.
- 10. Reporting Planned Changes. The Permittee shall notify the Department, in the form of a request for permit modification, at least 90 days prior to any change in the permitted service area, increase in the waste received, or change in the design or operating procedure as described in this permit, including any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.
- 11. Transfer of Permit. This permit may be transferred to a new owner or operator. All requests for transfer of permits shall be in writing and shall be submitted on forms provided by the Department. Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of this permit.
- 12. Certification of Construction. The Permittee may not commence disposal of waste in any new cell or phase until the Permittee has submitted to the Department, by certified mail or hand delivery, a letter signed by both the Permittee and a professional engineer stating that the facility has been constructed in compliance with the permit. The Department must inspect the constructed cells or phases before the owner or operator can commence waste disposal unless the Permittee is notified that the Department will waive the inspection.
- 13. Compliance Schedules. Reports of compliance or noncompliance with or any progress reports on interim and final requirements contained in any compliance schedule required and approved by the Department shall be submitted no later than 14 days following each schedule date.
- 14. Other Noncompliance. The Permittee shall report all instances of noncompliance with the permit at the time monitoring reports are submitted.
- 15. Other Information. If the Permittee becomes aware that information required by the Application was not submitted or was incorrect in the Application or in any report to the Department, the Permittee shall promptly submit such facts or information. In addition, upon request, the Permittee shall furnish to the Department, within a reasonable time, information related to compliance with the permit.
- F. Design and Operation of Facility. The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or nonsudden release of contaminants (including leachate and explosive gases) to air, soil, groundwater, or surface water, which could threaten human health or the environment.
- G. Inspection Requirements.
 - 1. The Permittee shall comply with all requirements set forth under ADEM Admin. Code Division 13.
 - 2. The Permittee shall conduct random inspections of incoming loads.
 - 3. Records of all inspections shall be included in the operating record.
- H. Recordkeeping and Reporting.
 - 1. The Permittee shall maintain a written operating record at the location specified in Section I.I. The operating record shall include:
 - a. Documentation of inspection and maintenance activities.

- b. Daily Volume reports.
 - c. Personnel training documents and records.
 - d. Solid/Hazardous Waste Determination Forms for Industrial Wastes, and associated ADEM disposal approval correspondence for special wastes, industrial wastes, etc.
 - e. Groundwater monitoring records.
 - f. Explosive gas monitoring records.
 - g. Surface water and leachate monitoring records. Monitoring is subject to applicable conditions of Section VII. of the permit.
 - h. Copies of this Permit and the Application.
 - i. Copies of all variances granted by the Department, including copies of all approvals of special operating conditions (such as approvals for open burning,).
2. Quarterly Volume Report. Beginning with the effective date of this permit, the Permittee shall submit, within thirty (30) days after the end of each calendar quarter, a report summarizing the daily waste receipts for the previous (just ended) quarter. Copies of the quarterly reports shall be maintained in the operating record.
3. Monitoring and Corrective Action Reports. The Permittee shall submit reports on all monitoring and corrective activities conducted pursuant to the requirements of this permit, including, but not limited to, groundwater, surface water, explosive gas and leachate monitoring. The groundwater monitoring shall be conducted in March and September of each year and the reports shall be submitted at least semi-annually. The reports should contain all monitoring results and conclusions from samples and measurements conducted during the sampling period. Explosive gas monitoring must be submitted on a quarterly basis, and the reports should be submitted to the department and placed in the operating record within 30 days of the monitoring event. Copies of the semi-annual groundwater and quarterly explosive gas monitoring reports shall be maintained in the operating record.
4. Availability, Retention, and Disposition of Records.
- a. All records, including plans, required under this permit or Division 13 must be furnished upon request, and made available at reasonable times for inspection by any officer, employee, or representative of the Department.
 - b. All records, including plans, required under this permit or Division 13 shall be retained by the Permittee for a period of at least three years. The retention period for all records is extended automatically during the course of any unresolved enforcement action regarding the facility, or as requested by the Department.
 - c. A copy of records of waste disposal locations and quantities must be submitted to the Department and local land authority upon closure of the facility.
- I. Documents to be Maintained by the Permittee. The Permittee shall maintain, at the Arrowhead Landfill office, the following documents and amendments, revisions and modifications to these documents until an engineer certifies closure of the permitted landfill.
- 1. Operating record
 - 2. Closure Plan.

- J. Mailing Location. All reports, notifications, or other submissions which are required by this permit should be sent via signed mail (i.e. certified mail, express mail delivery service, etc.) or hand delivered to:

Mailing Address.

Chief, Solid Waste Branch, Land Division
Alabama Department of Environmental Management
P.O. Box 301463
Montgomery, AL 36130-1463

Physical Address.

Chief, Solid Waste Branch, Land Division
Alabama Department of Environmental Management
1400 Coliseum Blvd.
Montgomery, Alabama 36110-2059

- K. Signatory Requirement. All applications, reports or information required by this permit, or otherwise submitted to the Department, shall be signed and certified by the owner as follows:
1. If an individual, by the applicant.
 2. If a city, county, or other municipality or governmental entity, by the ranking elected official, or by a duly authorized representative of that person.
 3. If a corporation, organization, or other legal entity, by a principal executive officer, of at least the level of Vice President, or by a duly authorized representative of that person.
- L. Confidential Information. The Permittee may claim information submitted as confidential if the information is protected under Code of Alabama 1975 §§ 22-39-18, as amended.
- M. State Laws and Regulations. Nothing in this permit shall be construed to preclude the initiation of any legal action or to relieve the Permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable state law or regulation.

SECTION II. GENERAL OPERATING CONDITIONS

- A. Operation of Facility. The Permittee shall operate and maintain the disposal facility consistent with the Application, this permit, and ADEM Admin. Code, Division 13.
- B. Open Burning. The Permittee shall not allow open burning without prior written approval from the Department and other appropriate agencies. A burn request should be submitted in writing to the Department outlining why that burn request should be granted. This request should include, but not be limited to, specifically what areas will be utilized, types of waste to be burned, the projected starting and completion dates for the project, and the projected days and hours of operation. The approval, if granted, shall be included in the operating record.
- C. Prevention of Unauthorized Disposal. The Permittee shall follow the approved procedures for the detecting and preventing the disposal of free liquids, regulated hazardous waste, PCB's, and medical waste at the facility.
- D. Unauthorized Discharge. The Permittee shall operate the disposal facility in such a manner that there will be no water pollution or unauthorized discharge. Any discharge from the disposal facility or practice thereof may require a National Pollutant Discharge Elimination System permit under the Alabama Water Pollution Control Act.

- E. Industrial and Medical Waste Disposal. The Permittee shall dispose of industrial process waste as required by ADEM Admin. Code Division 13, and as specified in the Application. The Permittee, prior to disposal of industrial waste and/or medical waste, shall obtain from each generator a written certification that the material to be disposed does not contain free liquids, regulated hazardous wastes, regulated medical waste, or regulated PCB wastes.
- F. Boundary Markers. The Permittee shall ensure that the facility is identified with a sufficient number of permanent boundary markers that are at least visible from one marker to the next.
- G. Certified Operator. The Permittee shall be required to have an operator certified by the Department on-site during hours of operation, in accordance with the requirements of ADEM Admin. Code 335-13-12.

SECTION III. SPECIFIC MSW LANDFILL REQUIREMENTS

- A. Waste Identification and Management.
 - 1. Subject to the terms of this permit, the Permittee may dispose of the nonhazardous solid wastes listed in Section III.B. Disposal of other waste streams is prohibited, except waste that is granted a temporary or one-time waiver by the Director.
 - 2. The total permitted area for the Arrowhead Landfill is 973.85 acres with 425.33 acres (Tract 1 is 117.63 acres, Tract 2 is 159.28 acres, and Tract 3 is 148.42 acres) permitted for disposal operations.
 - 3. The maximum average daily volume of waste disposed at the facility and approved by the Perry County Commission, and as contained in the permit application shall not exceed 15,000 tons/day, except as provided under Rule 335-13-5-.06(2)(a)5. The average daily volume shall be computed as specified by Rule 335-13-5-.06(2)(a)5.(i).
- B. Waste Streams. The Permittee may accept for disposal nonhazardous solid wastes, noninfectious putrescible and nonputrescible wastes including but not limited to household garbage, commercial waste, industrial waste, construction and demolition debris, tires, and other similar type materials. Special waste approved by ADEM may also be accepted.
- C. Service Area. The Service area for the Arrowhead Landfill as contained in the permit application and approved by the Perry County Commission is the States of Alabama, Arkansas, Connecticut, Delaware, Florida, Georgia, Illinois, Indiana, Iowa, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, New Hampshire, New Jersey, New York, North Carolina, Ohio, Oklahoma, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Vermont, Virginia, West Virginia and Wisconsin.
- D. Special Waste. Disposal of special wastes is subject to a Hazardous/Solid Waste determination by ADEM.
 - 1. Asbestos Waste. The Permittee shall dispose of asbestos waste in accordance with Rule 335-13-4-.26.
 - 2. Foundry Sand. The Permittee shall dispose of foundry waste in accordance with Rule 335-13-4-.26.
 - 3. Petroleum Contaminated Waste. The Permittee shall dispose of petroleum contaminated waste in accordance with Rule 335-13-4-.26.
 - 4. Municipal Solid Waste Ash. The Permittee shall dispose of municipal solid waste ash in accordance with Rule 335-13-4-.26.
- E. Liner Requirements. The Permittee shall install a composite liner system as described in the Application consisting of two feet of clay with a hydraulic conductivity of 1×10^{-7} cm/sec or less, overlain by a 60 mil High Density Polyethylene (HDPE) geomembrane, overlain by an 8 ounce per square yard non-woven

geotextile fabric, and overlain by 12" of protective cover with a hydraulic conductivity greater than or equal to 1×10^{-2} cm/sec. The base of the composite liner system shall be a minimum of five (5) feet above the temporal fluctuation of the groundwater table.

- F. Septic Tank Pumpings and Sewage Sludge. The Permittee shall not dispose of septic tank pumpings and/or sewage sludge unless specifically approved in writing by the department.
- G. Large Dead Animals and Highly Putrescible Wastes. The Permittee shall handle the disposal of large dead animals and/or highly putrescible waste as required by Rule 335-13-4-.22(1)(j).
- H. Cover Requirements. The Permittee shall cover all wastes as required by ADEM Admin. Code Division 13.

List of Alternate Daily Covers approved for use at the Arrowhead Landfill:

- 1. Synthetic Tarps. The Synthetic Tarps used should be at least 50' x 75' and shall be LandPac Tarps by Pactec or an equivalent. At the conclusion of each week's operation, the Permittee shall be required to cover all exposed waste with a minimum of six inches of compacted earth.
- 2. Petroleum Contaminated Soil (PCS). The maximum petroleum contaminant level of the soil that will be used as alternative daily cover material should be 100 parts per million (ppm) of Total Petroleum Hydrocarbons (TPH). The PCS should be used in the same manner as soil daily cover; covering the waste with a uniform compacted 6" thick layer. PCS should be stockpiled within the cell away from daily traffic and operations in such a manner that rainwater runoff will not leave the limits of the lined cell area.
- 3. Posi-shell. The Posi-shell will be spray-applied using a standard hydro seeding unit. The typical application thickness should be approximately 1/8" and should not be applied during extremely wet weather. During these extremely wet times, daily soil should be used to cover the waste. At the conclusion of each week's operation, the Permittee shall be required to cover all exposed waste with a minimum of six inches of compacted earth.
- 4. Automotive Shredder Residue (ASR). Automotive shredder residue (ASR) as it is commonly known is the non-metal waste generated after junked vehicles go through auto shredders. It is a mixture of crushed glass, ceramics, cloth, rubber, plastic, foam, wood, and air bags. About 25 percent of a shredded vehicle is ASR. Metal components, which are sold for reuse in new products, make up the remainder. ASR should be used in a 6" thick blanket in a manner similar to soil and consistent with the rules. ASR should not be used during rainfall events or on exterior slopes where runoff from the ASR could leave the cell. All run-off from ASR shall be contained within the lined cell. At the conclusion of each week's operation, the Permittee shall be required to cover all exposed waste with a minimum of six inches of compacted earth.
- I. Waste Compaction. All waste shall be thoroughly compacted with adequate landfill equipment before the daily cover is applied. A completed daily cell shall not exceed eight feet in vertical thickness measured perpendicular to the slope of the preceding cell.
- J. Daily Cells. All waste shall be confined to an area as small as possible and spread to a depth not exceeding two feet prior to compaction, and such compaction shall be accomplished on a face slope not to exceed 4 to 1 or as otherwise approved by the Department. Arrowhead Landfill is granted a variance to operate three working faces. Two working faces have been approved as follows: the first for the placement of MSW/Construction and Demolition waste and the second for the placement of ash waste. Additionally, a temporary working face has been approved for newly constructed cells. This working face will consist of a fluff layer or selected waste that will protect the integrity of the liner and will only be applicable for newly constructed cells until a sufficiently thick initial fluff lift has been achieved. (See Section X., A.). Each of the working faces should be confined to as small an area as possible.

- K. Security. The Permittee shall provide artificial and/or natural barriers, which prevent entry of unauthorized vehicular traffic to the facility.
- L. All Weather Access Roads. The Permittee shall provide an all-weather access road to the dumping face that is wide enough to allow passage of collection vehicles.
- M. Adverse Weather Disposal. The Permittee shall provide for disposal activities in adverse weather conditions.
- N. Personnel. The Permittee shall maintain adequate personnel to ensure continued and smooth operation of the facility.
- O. Equipment. The Permittee shall provide the landfill equipment as required by Rule 335-13-4-.22(1)(f).
- P. Environmental Monitoring and Treatment Structures. The Permittee shall provide protection and proper maintenance of environmental monitoring and treatment structures.
- Q. Vector Control. The Permittee shall provide for vector control as required by ADEM Admin. Code Division 13.
- R. Bulk or Noncontainerized Liquid Waste. The Permittee shall not dispose of bulk or noncontainerized liquid waste, or containers capable of holding liquids, unless the conditions of Rule 335-13-4-.22(1)(k) are met.
- S. Empty Containers. The Permittee shall render empty containers larger than normally found in household waste unsuitable for holding liquids prior to delivery to the landfill unit unless otherwise approved by the Department.
- T. Other Requirements. The Department may enhance or reduce any requirements for operating and maintaining the landfill as deemed necessary by the Land Division.
- U. Other Permits. The Permittee shall operate the landfill according to this and any other applicable permits. Additionally, the Department will verify that the Permittee has obtained a valid permit from the U. S. Army Corps of Engineers regarding an unnamed tributary located within Tract 3 before the construction of Tract 3 may commence.
- V. Scavenging and Salvaging Operations. The Permittee shall prevent scavenging and salvaging operations, except as part of a controlled recycling effort. Any recycling operation must be in accordance with plans submitted and approved by the Department.
- W. Signs. The Permittee shall provide a sign outlining instructions for use of the site. The sign shall be posted and have the information required by Rule 335-13-4-.22(1)(i).
- X. Litter Control. The Permittee shall control litter.
- Y. Fire Control. The Permittee shall provide fire control measures.

SECTION IV. GROUNDWATER MONITORING REQUIREMENTS

- A. The Permittee shall install and/or maintain a groundwater monitoring system, as specified below.
1. The permittee shall construct and maintain the groundwater monitoring wells identified in Tables IV.1. and IV.4. at the locations and schedules specified in the Application, and any other groundwater monitoring wells which are added (Section IV.A.3.) during the active life and the post closure care period.
 2. The Permittee shall maintain groundwater monitoring wells GWM-1 and GWM-5 as the background groundwater monitoring wells for the entire facility.

3. The Permittee shall install and maintain additional groundwater monitoring wells as necessary to assess changes in the rate and extent of any plume of contamination or as otherwise deemed necessary to maintain compliance with the ADEM Admin. Code.
4. Prior to installing any additional groundwater monitoring wells, the Permittee shall submit a report to the Department with a permit modification request specifying the design, location and installation of any additional monitoring wells. This report shall be submitted within ninety (90) days prior to the installation which, at a minimum, shall include.
 - a. Well construction techniques including proposed casing depths, proposed total depth, and proposed screened interval of well(s);
 - b. Well development method(s);
 - c. A complete analysis of well construction materials;
 - d. A schedule of implementation for construction; and
 - e. Provisions for determining the lithologic characteristics, hydraulic conductivity and grain-size distribution for the applicable aquifer unit(s) at the location of the new well(s).

B. Groundwater Monitoring Requirements.

1. The Permittee shall determine the groundwater surface elevation at each monitoring well and piezometer identified in Table IV.1. each time the well or piezometer is sampled and at least semi-annually throughout the active life and post-closure care period.
2. The Permittee shall determine the groundwater flow rate and direction in the first zone of saturation at least annually or each time groundwater is sampled and submit as required by ADEM Admin. Code Division 13.
3. Prior to the initial receipt of waste at the facility, the Permittee shall sample, and analyze for the parameters listed in Appendix I of Rule 335-13-4-.27, and/or any other parameters specified by the Department in Table IV. 2., all monitoring wells identified in Section IV.A.2. to establish background water quality and/or as directed by Rule 335-13-4-.27(2)(j) and 335-13-4-.27(2)(a)(1). The records and results of this sampling and analysis activity shall be submitted to the Department, within sixty (60) days of the date of sampling.
4. The Permittee shall sample and analyze all monitoring wells identified in Table IV.1 for the parameters listed in Appendix I of Rule 335-13-4-.27(3), and/or any other parameters specified by the Department in Table IV.3, on a semi-annual basis throughout the active life of the facility and the post-closure care period in accordance with Rule 335-13-4-.27(3). Sampling shall be conducted during March and September of each year, beginning with the effective date of this permit.
5. In addition to the requirements of Sections IV., B.1., B.2., B.3. and B.4., the Permittee shall record water levels, mean sea level elevation measuring point, depth to water, and the results of field tests for pH and specific conductance at the time of sampling for each well.

C. Sampling and Analysis Procedures. The Permittee shall use the following techniques and procedures when obtaining and analyzing samples from the groundwater monitoring wells described in Section IV.A. to provide a reliable indication of the quality of the groundwater.

1. Samples shall be collected, preserved, and shipped (when shipped off-site for analysis) in accordance with the procedures specified in the Application.

2. Samples shall be analyzed according to the procedures specified of the Application, Standard Methods for the Examination of Water and Wastewater (American Public Health Association, latest edition), Methods for Chemical Analysis of Water and Wastes (EPA-600/4-79-020), Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (EPA Publication SW-846, latest edition), or other appropriate methods approved by this Department. All field tests must be conducted using approved EPA test kits and procedures.
3. Samples shall be tracked and controlled using the chain-of-custody and QA/QC procedures specified of the Application.

D. Recordkeeping and Reporting Requirements.

1. Recording of Results. For each sample and/or measurement taken pursuant to the requirements of this permit, the Permittee shall record the information required by Section I.E.9.c.
 2. Recordkeeping. Records and results of all groundwater monitoring, sampling, and analysis activities conducted pursuant to the requirements of this permit shall be included in the operating record required by Section I.I.1.
- E. Permit Modification. If at any time the Permittee or the Department determines that the groundwater monitoring system no longer satisfies the requirements of 335-13-4-.14 or Section IV.A. of this permit, the Permittee must, within 90 days, submit an application for a permit modification to make any necessary and/or appropriate changes to the system.

TABLE IV.1.
INSTALLED GROUNDWATER MONITORING WELLS

Well	Northing	Easting	Conc/Disk Env	Top Casing Elev	PVC Elev	Surface Elev	Well Type
GWM-1	884667.24	1979482.39	200.63	203.37	203.32	200.1	Up Grad
GWM-2	876720.18	1978344.96	271.63	274.67	274.42	271.2	Dn. Grad
GWM-3	877237.63	1977604.4	269.96	272.67	272.54	269.5	Dn. Grad
GWM-4	877927.07	1976503.62	269.63	272.66	272.55	269.0	Dn. Grad
GWM-5	883499.74	1976238.62	213.26	215.84	215.76	212.7	Up Grad
GWM-15	876717.19	1978352.88	271.69	274.69	274.62	271.2	Dn. Grad
GWM-16	877234.71	1977611.58	269.83	272.72	272.51	269.5	Dn. Grad
GWM-17	877934.67	1976495.99	269.85	273.33	273.20	269.4	Dn. Grad

*ft-bls = Depth in feet below land surface

TABLE IV.2.
BACKGROUND GROUNDWATER MONITORING

NOTE: The parameters in this Table are those listed in Appendix I of Chapter 335-13-4.

NOTE: The Permittee shall conduct a minimum of four independent sampling events as the initial sampling event, and analyze for the parameters listed above, in order to establish background water quality. Following the four independent events, the Permittee can submit a request, with justification, for the deletion of or change in these parameters.

TABLE IV.3.
SEMI-ANNUAL GROUNDWATER MONITORING PARAMETERS

NOTE: The parameters in this Table are those listed in Appendix I of Chapter 335-13-4 , and/or any other waste stream specific parameters.

TABLE IV.4.
GROUNDWATER MONITORING WELLS TO BE INSTALLED

Monitoring Well Number	Top of Casing (feet msl)	Part Monitoring
GWM-6	To be installed	Tract 1
GWM-7	To be installed	Tract 2
GWM-8	To be installed	Tract 2
GWM-9	To be installed	Tract 2
GWM-10	To be installed	Tract 2
GWM-11	To be installed	Tract 2
GWM-12	To be installed	Tract 1
GWM-13	To be installed	Tract 1
GWM-14	To be installed	Tract 1
GWM-18	To be installed	Tract 1
GWM-19	To be installed	Tract 2
GWM-20	To be installed	Tract 2
GWM-21	To be installed	Tract 2
GWM-22	To be installed	Tract 2
GWM-23	To be installed	Tract 2
GWM-24	To be installed	Tract 2
GWM-25	To be installed	Tract 2
GWM-26	To be installed	Tract 2
GWM-27	To be installed	Tract 3
GWM-28	To be installed	Tract 3
GWM-29	To be installed	Tract 3
GWM-30	To be installed	Tract 3
GWM-31	To be installed	Tract 3
GWM-32	To be installed	Tract 3
GWM-33	To be installed	Tract 3
GWM-34	To be installed	Tract 3
GWM-35	To be installed	Tract 3
GWM-36	To be installed	Tract 3
GWM-37	To be installed	Tract 3
GWM-38	To be installed	Tract 3
GWM-39	To be installed	Tract 3
GWM-40	To be installed	Tract 3

SECTION V. GAS MONITORING REQUIREMENTS

The Permittee must install and maintain an explosive gas monitoring system in accordance with ADEM Admin. Code Division 13.

SECTION VI – MUNICIPAL SOLID WASTE LANDFILL AIR EMISSIONS

This landfill may be subject to ADEM Admin. Code Division 3 Admin. Code and the Federal Clean Air Act. Contact the ADEM Air Division for applicable requirements and permits.

SECTION VII. LEACHATE AND SURFACE WATER MANAGEMENT REQUIREMENTS

The Permittee must collect and dispose of the leachate that is generated at the facility. The Permittee shall install a leachate collection system designed to maintain less than 12 inches (30 cm) depth of leachate over the liner. Prior to disposal, the permittee shall provide the Department with a letter from the receiving publicly or privately owned treatment works, approving the acceptance of the leachate. Discharges to publicly or privately owned treatment works may be subject to the requirements of the ADEM Water Division's State Indirect Discharge (SID) Program. The permittee shall construct and maintain run-on and run-off control structures. Surface water discharges from drainage control structures shall be permitted through the ADEM Water Division's National Pollutant Discharge Elimination System (NPDES) Program.

Arrowhead Landfill is granted permission for leachate recirculation. Leachate recirculation should be accomplished through two (2) methods. The first method should involve loading leachate at the leachate storage tank and hauling it by tanker to the working face where it will be distributed via a spray nozzle. The second method should involve injecting leachate into the leachate recirculation lines that will be constructed 4' to 6' below the waste surface. Both methods should distribute leachate at a rate and manner that does not cause runoff, odor, or operation difficulties. Leachate should not be recirculated during or immediately after rainfall events. Also, care should be taken to assure that no more leachate is applied than the facility can manage. Records of leachate recirculation should be made part of the facility operating record. The maximum daily leachate recirculation should be 20,000 gpd and should only be applied where there is a minimum of 20 feet of waste in place.

The Permittee is also granted permission to construct an Intermediate Drainage System (Capillary Break) to provide stability to the waste mass in the coal ash disposal area in the Tract 1 Area of the landfill and as depicted on the engineering plans dated July 30, 2010. This Intermediate Drainage System should be constructed with Double Bonded Geocomposite Drainage Media as its primary drainage path. The Geocomposite Drainage Media should be 250 mil thick HDPE geonet material with 6 ounce per square yard non-woven geotextile bonded to the geonet. The proposed system should require the Geocomposite Drainage Media to be placed over a large portion of the Tract 1 area at grades greater than 5% and less than 10% and should be installed approximately 90 vertical feet above the landfill base liner system to promote drainage within the waste mass at that elevation.

SECTION VIII. CLOSURE AND POST-CLOSURE REQUIREMENTS

The Permittee shall close the landfill and perform post-closure care of the landfill in accordance with Division 13.

- A. Final Cover. The Permittee shall grade final soil cover such that surface water does not pond over the permitted area as specified in the Application. The final cover system as specified in the application shall consist of 12 inches of compacted soil with a permeability of 1×10^{-5} cm/sec, 40 mil flexible membrane liner, geocomposite drainage system, 18 inches of protective soil, 6 inches of topsoil capable of supporting vegetative cover.
- B. Vegetative Cover. The Permittee shall establish a vegetative or other appropriate cover within 90 days after completion of final grading requirements in the Application. Preparation of a vegetative cover shall include, but not be limited to, the placement of seed, fertilizer, mulch, and water.
- C. Notice of Intent. The Permittee shall place in the operating record and notify the Department of their intent to close the landfill prior to beginning closure.
- D. Completion of Closure Activities. The Permittee must complete closure activities of each landfill unit in accordance with the Closure Plan within 180 days of the last known receipt of waste.
- E. Certification of Closure. Following closure of each unit, the Permittee must submit to the Department a certification, signed by an engineer, verifying the closure has been completed according to the Closure Plan.

- F. Post-Closure Care Period. Post-closure care activities shall be conducted after closure of each unit throughout the life of this permit and continuing for a period of thirty (30) years following closure of the facility. The Department may shorten or extend the post-closure care period applicable to the solid waste disposal facility. The Permittee shall reapply in order to fulfill the post-closure care requirements of this permit.
- G. Post-Closure Maintenance. The Permittee shall provide post closure maintenance of the facility to include regularly scheduled inspections. This shall include maintenance of the cover, vegetation, monitoring devices and pollution control equipment and correction of other deficiencies that may be observed by ADEM. Monitoring requirements shall continue throughout the post closure period as determined by the Department unless all waste is removed and no unpermitted discharge to waters of the State have occurred.
- H. Post-Closure Use of Property. The Permittee shall ensure that post closure use of the property never be allowed to disturb the integrity of the final cover, liner, or any other component of the containment system. This shall preclude the growing of deep-rooted vegetation on the closed area.
- I. Certification of Post-Closure. Following post-closure of each unit, the Permittee must submit to the Department a certification, signed by an engineer, verifying the post-closure has been completed according to the Post-Closure Plan.
- J. Notice in Deed to Property. The Permittee shall record a notation onto the land deed containing the property utilized for disposal within 90 days after permit expiration, revocation or when closure requirements are achieved as determined by the Department as stated in the Application. This notation shall state that the land has been used as a solid waste disposal facility, the name of the Permittee, type of disposal activity, location of the disposal facility and beginning and closure dates of the disposal activity.
- K. Recording Instrument. The Permittee shall submit a certified copy of the recording instrument to the Department within 120 days after permit expiration, revocation, or as directed by the Department as described in the Application.
- L. Removal of Waste. If the Permittee, or any other person(s), wishes to remove waste, waste residues, the liner, or any contaminated soils, the owner must request and receive prior approval from the Department.

SECTION IX. FINANCIAL ASSURANCE

- A. The Permittee shall maintain detailed written cost estimates, in current dollars, at the landfill office and on file with ADEM in accordance with ADEM Admin. Code 335-13-4-28.
- B. All cost estimates must be updated annually as required by ADEM Admin Code 335-13-4-28.
- C. The Permittee must place a copy of the financial assurance mechanism along with other items required by ADEM Admin. Code 335-13-4-28. into the landfill operating record and submitted to ADEM before the initial receipt of waste in the case of closure, post-closure care, or no later than 120 days after corrective action remedy has been selected.
- D. The financial assurance mechanisms must ensure that funds will be available in a timely fashion when needed.
- E. The financial assurance mechanisms must be legally valid, binding, and enforceable under state and federal law.
- F. The Permittee shall demonstrate continuous compliance with ADEM Admin. Code 335-13-4-28. by providing documentation of financial assurance in at least the amount that equals or exceeds the cost estimate. Changes in the financial assurance mechanism must be approved by the Department.

- G. The Permittee shall increase the closure, post-closure or corrective action cost estimates and the amount of financial assurance if changes in the closure, post-closure or correction action plans or landfill conditions increase the maximum cost.
- H. The Permittee may reduce the amount of financial assurance by submitting justification and a revised estimate to ADEM for approval.

SECTION X. VARIANCES

- A. A variance is granted for the Arrowhead Landfill from Rule 335-13-4-.22.(1)(b) which states that all waste shall be confined to as small an area as possible. Under this variance, the Arrowhead Landfill is allowed to operate three working faces. Two working faces have been approved as follows: the first for the placement of MSW/Construction and Demolition waste and the second for the placement of ash waste. Additionally, a temporary working face has been approved for newly constructed cells. This working face will consist of a fluff layer or selected waste that will protect the integrity of the liner and will only be applicable for newly constructed cells until a sufficiently thick initial fluff lift has been achieved. Each of the working faces should be confined to as small an area as possible. (See Section III., J.)
- B. A variance is granted from Rule 335-13-4-.20(2)(c)3. requiring terraces every 20 feet rise in elevation. This variance requires terraces every 40 feet rise in elevation.

Any variance granted by the Department may be terminated by the Department whenever the Department finds, after notice and opportunity for hearing, that the petitioner is in violation of any requirement, condition, schedule, limitation or any other provision of the variance, or that operation under the variance does not meet the minimum requirements established by state and federal laws.

